No.	

In the U.S. Court of Appeals for the District of Columbia Circuit

IN RE PETER WIILIAMS, Petitioner,

ADDENDUM TO PETITION FOR A WRIT OF MANDAMUS

Lawrence J. Joseph, DC Bar #464777 Law Office of Lawrence J. Joseph 1250 Connecticut Ave., NW, Ste. 700-1A Washington, DC 20036

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Counsel for Petitioner Peter Williams

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Corporate Disclosure Statement

Pursuant to FED. R. APP. P. 26.1 and Circuit Rules 21(d) and 26.1, petitioner

Peter Williams is a natural person, for whom no disclosure is required.

Dated: September 20, 2023 Respectfully submitted,

/s/ Lawrence J. Joseph

Lawrence J. Joseph, D.C. Bar #464777

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Counsel for Petitioner Peter Williams

Certificate as to Parties, Rulings, and Related Cases

Pursuant to Circuit Rules 21(d) and 28(a)(1), counsel for petitioner Peter Williams presents the following certificate as to parties and *amici curiae*, rulings, and related cases.

A. Parties and Amici

The parties and *amici curiae* are as follows:

- 1. Petitioner is Peter Williams, an applicant for hydrofluorocarbon allowances as a new market entrant under 40 C.F.R. § 84.15; he administratively petitioned respondent Environmental Protection Agency ("EPA") to reconsider the denial of his application.
- 2. Respondents are EPA and its Administrator.
- 3. No person or entity has appeared as an *amicus curiae*.

B. Rulings under Review

This petition for a writ of mandamus seeks to compel action on Williams' administrative petition for reconsideration dated April 20, 2022 (letter of J. Gordon Arbuckle), as supplemented on December 12, 2022 (letter of Lawrence J. Joseph), and the letter of RMS of Georgia dated December 29, 2022 (letter of Kenneth Ponder), with respect to EPA's denial dated March 31, 2022, of Williams application as a new-market entrant under 40 C.F.R. § 84.15.

C. Related Cases

This action relates to *Williams v. Environmental Protection Agency*, No. 22-1314 (D.C. Cir.). There are no other related cases within the meaning of this Court's Local Rule 28(a)(1)(C).

Dated: September 20, 2023 Respectfully submitted,

/s/ Lawrence J. Joseph

Lawrence J. Joseph, D.C. Bar #464777

1250 Connecticut Ave, NW, Ste. 700-1A

Washington, DC 20036

Tel: 202-355-9452 Fax: 202-318-2254

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Counsel for Appellants

5 U.S.C. § 555(b)

A person compelled to appear in person before an agency or representative thereof is entitled to be accompanied, represented, and advised by counsel or, if permitted by the agency, by other qualified representative. A party is entitled to appear in person or by or with counsel or other duly qualified representative in an agency proceeding. So far as the orderly conduct of public business permits, an interested person may appear before an agency or its responsible employees for the presentation, adjustment, or determination of an issue, request, or controversy in a proceeding, whether interlocutory, summary, or otherwise, or in connection with an agency function. With due regard for the convenience and necessity of the parties or their representatives and within a reasonable time, each agency shall proceed to conclude a matter presented to it. This subsection does not grant or deny a person who is not a lawyer the right to appear for or represent others before an agency or in an agency proceeding.

5 U.S.C. § 559

This subchapter, chapter 7, and sections 1305, 3105, 3344, 4301(2)(E), 5372, and 7521 of this title, and the provisions of section 5335(a)(B) of this title that relate to administrative law judges, do not limit or repeal additional requirements imposed by statute or otherwise recognized by law. Except as otherwise required by law, requirements or privileges relating to evidence or procedure apply equally to agencies and persons. Each agency is granted the authority necessary to comply with the requirements of this subchapter through the issuance of rules or otherwise. Subsequent statute may not be held to supersede or modify this subchapter, chapter 7, sections 1305, 3105, 3344, 4301(2)(E), 5372, or 7521 of this title, or the provisions of section 5335(a)(B) of this title that relate to administrative law judges, except to the extent that it does so expressly.

5 U.S.C. § 705

When an agency finds that justice so requires, it may postpone the effective date of action taken by it, pending judicial review. On such conditions as may be required and to the extent necessary to prevent irreparable injury, the reviewing court, including the court to which a case may be taken on appeal from or on application for certiorari or

other writ to a reviewing court, may issue all necessary and appropriate process to postpone the effective date of an agency action or to preserve status or rights pending conclusion of the review proceedings.

5 U.S.C. § 706

To the extent necessary to decision and when presented, the reviewing court shall decide all relevant questions of law, interpret constitutional and statutory provisions, and determine the meaning or applicability of the terms of an agency action. The reviewing court shall—

- (1)compel agency action unlawfully withheld or unreasonably delayed; and
- (2)hold unlawful and set aside agency action, findings, and conclusions found to be—
- (A)arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law;
- (B)contrary to constitutional right, power, privilege, or immunity;
- (C)in excess of statutory jurisdiction, authority, or limitations, or short of statutory right;
- (D)without observance of procedure required by law;
- (E)unsupported by substantial evidence in a case subject to sections 556 and 557 of this title or otherwise reviewed on the record of an agency hearing provided by statute; or
- (F)unwarranted by the facts to the extent that the facts are subject to trial de novo by the reviewing court.

In making the foregoing determinations, the court shall review the whole record or those parts of it cited by a party, and due account shall be taken of the rule of prejudicial error.

28 U.S.C. § 1651(a)

28 U.S.C. § 2201(a)

In a case of actual controversy within its jurisdiction, except with respect to Federal taxes other than actions brought under section 7428 of the Internal Revenue Code of 1986, a proceeding under section 505 or 1146 of title 11, or in any civil action involving an antidumping or countervailing duty proceeding regarding a class or kind of merchandise of a free trade area country (as defined in section 516A(f)(9) of the Tariff Act of 1930), as determined by the administering authority, any court of the United States, upon the filing of an appropriate pleading, may declare the rights and other legal relations of any interested party seeking such declaration, whether or not further relief is or could be sought. Any such declaration shall have the force and effect of a final judgment or decree and shall be reviewable as such.

28 U.S.C. § 2202

Further necessary or proper relief based on a declaratory judgment or decree may be granted, after reasonable notice and hearing, against any adverse party whose rights have been determined by such judgment.

42 U.S.C. § 7675(k)(1)(C)

Sections 113, 114, 304, and 307 of the Clean Air Act (42 U.S.C. 7413, 7414, 7604, 7607) shall apply to this section and any rule, rulemaking, or regulation promulgated by the Administrator pursuant to this section as though this section were expressly included in title VI of that Act (42 U.S.C. 7671 et seq.).

42 U.S.C. § 7607(b)

(b)Judicial review

(1)A petition for review of action of the Administrator in promulgating any national primary or secondary ambient air quality standard, any emission standard or requirement under section 7412 of this title, any standard of performance or requirement under section 7411 of this title,,3 any standard under section 7521 of this title (other than a standard required to be prescribed under section 7521(b)(1) of this title), any determination under section 7521(b)(5) 1 of this title, any control or prohibition under section 7545 of this title, any standard under section 7571 of this title, any rule issued under section 7413, 7419, or under section 7420 of this title, or any other nationally

applicable regulations promulgated, or final action taken, by the Administrator under this chapter may be filed only in the United States Court of Appeals for the District of Columbia. A petition for review of the Administrator's action in approving or promulgating any implementation plan under section 7410 of this title or section 7411(d) of this title, any order under section 7411(j) of this title, under section 7412 of this title, under section 7419 of this title, or under section 7420 of this title, or his action under section 1857c–10(c)(2)(A), (B), or (C) of this title (as in effect before August 7, 1977) or under regulations thereunder, or revising regulations for enhanced monitoring and compliance certification programs under section 7414(a)(3) of this title, or any other final action of the Administrator under this chapter (including any denial or disapproval by the Administrator under subchapter I) which is locally or regionally applicable may be filed only in the United States Court of Appeals for the appropriate circuit. Notwithstanding the preceding sentence a petition for review of any action referred to in such sentence may be filed only in the United States Court of Appeals for the District of Columbia if such action is based on a determination of nationwide scope or effect and if in taking such action the Administrator finds and publishes that such action is based on such a determination. Any petition for review under this subsection shall be filed within sixty days from the date notice of such promulgation, approval, or action appears in the Federal Register, except that if such petition is based solely on grounds arising after such sixtieth day, then any petition for review under this subsection shall be filed within sixty days after such grounds arise. The filing of a petition for reconsideration by the Administrator of any otherwise final rule or action shall not affect the finality of such rule or action for purposes of judicial review nor extend the time within which a petition for judicial review of such rule or action under this section may be filed, and shall not postpone the effectiveness of such rule or action.

(2)Action of the Administrator with respect to which review could have been obtained under paragraph (1) shall not be subject to judicial review in civil or criminal proceedings for enforcement. Where a final decision by the Administrator defers performance of any nondiscretionary statutory action to a later time, any person may challenge the deferral pursuant to paragraph (1).

42 U.S.C. § 7607(d)(1)

- (d)Rulemaking
- (1) This subsection applies to—
- (A)the promulgation or revision of any national ambient air quality standard under section 7409 of this title,
- (B)the promulgation or revision of an implementation plan by the Administrator under section 7410(c) of this title,
- (C)the promulgation or revision of any standard of performance under section 7411 of this title, or emission standard or limitation under section 7412(d) of this title, any standard under section 7412(f) of this title, or any regulation under section 7412(g)(1)(D) and (F) [6] of this title, or any regulation under section 7412(m) or (n) of this title,
- (D)the promulgation of any requirement for solid waste combustion under section 7429 of this title,
- (E)the promulgation or revision of any regulation pertaining to any fuel or fuel additive under section 7545 of this title,
- (F)the promulgation or revision of any aircraft emission standard under section 7571 of this title,
- (G)the promulgation or revision of any regulation under subchapter IV—A (relating to control of acid deposition),
- (H)promulgation or revision of regulations pertaining to primary nonferrous smelter orders under section 7419 of this title (but not including the granting or denying of any such order),
- (I)promulgation or revision of regulations under subchapter VI (relating to stratosphere and ozone protection),
- (J)promulgation or revision of regulations under part C of subchapter I (relating to prevention of significant deterioration of air quality and protection of visibility),
- (K)promulgation or revision of regulations under section 7521 of this title and test procedures for new motor vehicles or engines under section 7525 of this title, and the revision of a standard under section 7521(a)(3) of this title,

(L)promulgation or revision of regulations for noncompliance penalties under section 7420 of this title,

(M)promulgation or revision of any regulations promulgated under section 7541 of this title (relating to warranties and compliance by vehicles in actual use),

(N)action of the Administrator under section 7426 of this title (relating to interstate pollution abatement),

(O)the promulgation or revision of any regulation pertaining to consumer and commercial products under section 7511b(e) of this title,

(P)the promulgation or revision of any regulation pertaining to field citations under section 7413(d)(3) of this title,

(Q)the promulgation or revision of any regulation pertaining to urban buses or the clean-fuel vehicle, clean-fuel fleet, and clean fuel programs under part C of subchapter II,

(R)the promulgation or revision of any regulation pertaining to nonroad engines or nonroad vehicles under section 7547 of this title,

(S)the promulgation or revision of any regulation relating to motor vehicle compliance program fees under section 7552 of this title,

(T)the promulgation or revision of any regulation under subchapter IV–A (relating to acid deposition),

(U)the promulgation or revision of any regulation under section 7511b(f) of this title pertaining to marine vessels, and

(V)such other actions as the Administrator may determine.

The provisions of section 553 through 557 and section 706 of title 5 shall not, except as expressly provided in this subsection, apply to actions to which this subsection applies. This subsection shall not apply in the case of any rule or circumstance referred to in subparagraphs (A) or (B) of subsection 553(b) of title 5.

42 U.S.C. § 7607(d)(5)

In promulgating a rule to which this subsection applies (i) the Administrator shall allow any person to submit written comments, data,

or documentary information; (ii) the Administrator shall give interested persons an opportunity for the oral presentation of data, views, or arguments, in addition to an opportunity to make written submissions; (iii) a transcript shall be kept of any oral presentation; and (iv) the Administrator shall keep the record of such proceeding open for thirty days after completion of the proceeding to provide an opportunity for submission of rebuttal and supplementary information.

42 U.S.C. § 7607(d)(7)(B)

Only an objection to a rule or procedure which was raised with reasonable specificity during the period for public comment (including any public hearing) may be raised during judicial review. If the person raising an objection can demonstrate to the Administrator that it was impracticable to raise such objection within such time or if the grounds for such objection arose after the period for public comment (but within the time specified for judicial review) and if such objection is of central relevance to the outcome of the rule, the Administrator shall convene a proceeding for reconsideration of the rule and provide the same procedural rights as would have been afforded had the information been available at the time the rule was proposed. If the Administrator refuses to convene such a proceeding, such person may seek review of such refusal in the United States court of appeals for the appropriate circuit (as provided in subsection (b)). Such reconsideration shall not postpone the effectiveness of the rule. The effectiveness of the rule may be stayed during such reconsideration, however, by the Administrator or the court for a period not to exceed three months.

40 C.F.R. § 84.15(c)

Consumption allowances in paragraph (a) of this section are available to either:

- (1) Persons who imported regulated substances in 2020 that were not required to report under 40 CFR part 98 and were not issued allowances as of October 1, 2021; or
- (2) Persons who are newly importing regulated substances, do not share corporate or common ownership, corporate affiliation in the past five years, or familial relations with entities receiving allowances through this rule.



December 2, 2021

To Whom It May Concern,

Peter Williams/dba The New Era Group intends to import HFC refrigerants in calendar years 2022 and 2023. **The New Era Group**, nor myself share any corporate or common ownership, corporate affiliation within the last five years, or familial relations with entities receiving allowances through the rule entitles, "Phasedown of Hydrofluorocarbons; Establishing the Allowance Allocation and Trading Program under the American Innovation and Manufacturing Act". I have read the HFC Allocation Final Rule, and understand the sections as noted in this application for allocations as follows:

- 40 CFR 84.5 Prohibitions relating to regulated substances
- 40 CFR 84.15 Set-aside of application-specific allowances, production allowances, and consumption allowances
- 40 CFR 84.19 Transfers of allowances
- 40 CFR 84.23 Certification identification generation and tracking
- 40 CFR 84.31(a), (c), (h), and (k) Recordkeeping and reporting
- 40 CFR 84.33 Auditing of recordkeeping and reporting
- 40 CFR 84.35 Administrative consequences.

Peter Williams/dba The New Era Group agrees and certifies the following:

- 1. will follow all applicable DOT standards, and all cylinders and containers used by
- 2. will be compliant with the DOT standards found at CFR Title 49 part §178.
- 3. will pay any duties consistent with US Customs and Boarder Protection requirements per Title 19.
- 4. will comply with all EPA requirements, including those established under the AIM Act and annual Greenhouse Gas reporting requirements §84.15(d)(2)(viii).

The information submitted in this letter and the application form is complete, accurate, and truthful. §84.15(d)(2)(ix)

Thank you,

Peter Williams

American Innovation and Manufacturing Act - Application for Set-aside of HFC Allowances

Version:
1.0
Updated:
10/29/2021
External Link:
Final Rule - Phasedown of Hydrofluorocarbons: Establishing the Allowance Allocation and Trading Program Under the American Innovation and Manufacturing Act

Section 3a - New Market Entrant Information

Instructions: Persons who are seeking to become a new market entrant (i.e., new importer), do not share corporate or common ownership, corporate affiliation in the Instructions: Persons who are seeking to become a new market entrant (i.e., new importer), do not share corporate or common ownership, corporate affiliation in the past five years, or familial relations with entities receiving allowances, and were not eligible for allowances as of October 1, 2021, must provide the information requested below. Companies must demonstrate an ability to make use of allowances. Further, companies without a detailed import plan and a prospective foreign exporter will not be eligible to receive allowances from the set-aside pool.

Ca	Owner of the Company 804. In(u)(z)(iii)		
Contact Name	Contact Email	Contact Phone	
Peter Williams	Peter@neweragroupinc.com	2025280038	
			•
Is the company a woman or minority owned businesss. §84.15(d)(2)(ii)	Date of Incorporation §84.15(d)(2)(iv)	State in which Company is Incorporated §84.15(d)(2)(iv)	State License Identifier §84.15(d)(2)(v)
Minority-owned business	Un-Incorperated	South Carolina	Non

For a calculator to convert kilograms of HFCs to MTEVe, please visit https -allowance-allocations>

Section 3b - Plan for Importing HFCs Instructions: Provide the following information detailing the company's plan for importing HFCs. §84.15(d)(2)(vi)

nstructions: Describe what equipment and facilities the company has or needs to acquire to manage compressed gases

ere is sufficient capacity in the US to utilize existing equipment and capital of other small business concerns. Do to the structure of the "set-aside" ogram and many business uncertainties associated with HFC utilization of other small disadvantaged businesses is the wiser way to engage in this space nere has always been a barrier to capital with respect to refrigerant reaclaim and packaging.

If yes, has the company reported prior imports to the Greenhouse Gas Reporting Program?	any past experience importing HFCs?	ently sell HFCs or other industrial gases?
No	Yes	Yes

If you responded yes to either question above, describe your experience.

Peter Williams and New Era has facilitated and coordinated imports of significant quantities and assisted small importers to achieve imports through monitoring and guiding them on EPA Regulations as well as CBP have not been the importer of record. Strong relationship with Customs Broker.

Provide contact information for the brokerage firm.	If yes, which brokerage firm?	Will the company be working with a customs broker?	
(404) 761 5974	DJ Powers	Yes	

month	miceria to importantos
January	Yes
February	Unsure
March	Unsure
April	No
May	No

June	No
July	No
Augus	No
September	Unsure
October	Unsure
November	No
December	No

Instructions: Identify the single component HFC(s) the company intends to import and the CAS number for each

	HFC-143a	HFC-134a	HFC-125	HFC-32	HFC	Intended HFC Imports
	420-46-2	811-97-2	354-33-6	75-10-5	CAS Number	Imports

Instructions: Identify the HFC blends the company intends to import and the ASHRAE numerical designation of the refrigerant or the percentage of the mixture containing each regulated substance and the CAS numbers for each neat HFC.

			Intended HFC Blend Import	rts					
		HFC Component (1)			HFC Component (2)			HFC Component (3)	
HFC Blend	HFC	HFC Composition of Blend (%)	CAS Number	HFC	HFC Composition of Blend (%)	CAS Number	HFC	HFC Composition of Blend (%)	CAS
R-404A	HFC-125	44%	354-33-6	HFC-143a	52%	420-46-2	HFC-134a	4%	8
R-407C	HFC-32	20%	75-10-5	HFC-125	40%	354-33-6	HFC-134a	40%	8
R-410A	HFC-125	50%	354-33-6	HFC-32	50%	75-10-5			

\S Number

Instructions: Identify the HTS codes for the HFCs and HFC blends the company intends to import.

Instructions: Identify the prospective foreign exporter that the applicant anticipates working with and provide confirmation from the foreign exporter that the timeline for imports is accurate and achievable. §84.15(d)(2)(vii)

Relationship with Zehejiang Yorghe Refrigerant Co since 2017, see attached

ertification that I and/or my company do not share corporate or common ownership, corporate affiliation in the past five ears, or familial relations with entities receiving allowances through the rule entitled, "Phasedown of Hydrofluorocarbons: Yes

regulation:
40 CFR 84.5 Prohibitions relating to regulated substances.
40 CFR 84.15 Ser-aside of application-specific allowances, production allowances, and consumption allowances.
40 CFR 84.19 Transfers of allowances.
40 CFR 84.21 Certification identification generation and tracking.
40 CFR 84.32 (e.j. (h.j.), and (k) Recordkeeping and reporting.
40 CFR 84.33 Auditing of recordkeeping and reporting.
40 CFR 84.35 Administrative consequences. The company has read the HFC Allocation final rule, available by visiting
https://www.federatregister.gov/documents/2021/10/05/2021-21/030/phasedown-of-hydrofluorocarbons-establishing-the--and understands the following sections of the new HFC Allocation-and-trading-program-under-the--and understands the following sections of the new HFC Allocation and understands the following sections of the new HFC Allocation and understands the following sections of the new HFC Allocation and understands the following sections of the new HFC Allocation and understands the following sections of the new HFC Allocation and understands the following sections of the new HFC Allocation and understands the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following sections of the new HFC Allocation and the following section and the Yes

Vac	The information submitted in this form is complete accurate and truthful \$84.15/d)/2)(iv)
Yes	The company will comply with all EPA requirements, including those established under the AIM Act and annual Greenhouse Gas reporting requirements. §84.15(d)(2)(viii)
Yes	The company will pay any duties conistent with U.S. Customs and Border Protection (CBP) requirements per Title 19.
	used by the company will be compliant with the DOT standards found at CFR Title 49 part §178.
≺ps	The company will meet all applicable U.S. Department of Transportation (DOT) standards and all cylinders and containers

Addendum

When the Environmental Protection Agency promulgated the Chlorofluorocarbon (CFC) phase out, I owned and operated New Era Environmental. New Era Environmental even today is the only EPA and AHRI minority reclaim facility in the United States. Located in Sterling Virginia the company had to overcome the high operational cost in the Washington Metropolitan Area. There was a great demand for the services that New Era provided. I am proud of the work that I was able to undertake.

Most notable Jobs:

AT&T Bell Labs Murray Hill New Jersey

US Customs and Boarder Control Patrol Seizure San Padro California (Smuggled CFCs)

DOJ Mission Critical Bank, contract awards in both new and reclaim of refrigerants.

DuPont Deep Water New Jersey

Allied Signal/Honeywell recovered CFC-12 in refinery Moab, Utah

Carrier Corporation Herndon Virginia

National Institutes of Health, Bethesda Maryland

Trane Company Boland Services Rockville, Maryland

Dulles Airport Chilled Water replacement

World Financial Center (250 Vesey Street New York before after and during 911)

The United Stated Department of Defense, Pentagon Power Plant Project

Inter State Commerce Commission now EPA remodeling

Recover of refrigerants from the White House to the Capital not one EPA violation or sanction

These credentials must be considered as to the knowledge and ability to import, transfer and blend HFCs.



ADD:No. E-025, Dong Gang Industrial District, Quzhou, Zhejiang, China 衛州东港工业园区 E-025号 TEL:0086-0570-8886807, 3832776 [770] (780) FAX:0086-0570-3832767 Email: zjyhchem@yahoo.com

To Who Maybe Concern

Ref. Peter Williams

As we previously supply you in the past with gases we write this letter is to confirm the intention to continue supply our customer with HFC's gases in the year 2022 and following.

Zhejiang Yonghe Refrigerant Co., Ltd.

21th. Nov. 2021

浙江永和制冷股份有限公司 ZHEJIANG YONGHE REFRIGERANT CO.,LTD.

Memorandum of Minority Self Certifying

To: HFC Allocation From: Peter Williams

Subject The file of HFC Set-aside allowance

Date: February 18, 2022

Please accept this communication as an inclusion to my application for HFC set aside allowances in the amount of 200,000 MTEVe. The process that is outlined in 40 CFR Chapter 1 Subchapter C part 84 Subpart A § 84.15 refers to a "Person/Persons".

My application for the aforementioned set-aside allowance was filed as an individual. Therefore, based on the clear use of the word person or person, I meet the qualification set-forth in the CFR.

This correspondence is offered to satisfy the application requirement for proof of corporate structure, of which there is none for myself as an individual.

With Best Regards



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

March 31, 2022

OFFICE OF AIR AND RADIATION

Mr. Peter Williams New Era Group 709 Pickering Drive Unit B Murrells Inlet, South Carolina 29567

Dear Mr. Peter Williams,

This letter communicates EPA's decision regarding Peter Williams DBA New Era Group (New Era Group)'s application for set-aside allowances under 40 CFR § 84.15(c). In accordance with the methodology finalized in the final Hydrofluorocarbon (HFC) Allowance Allocation and Trading Framework Rule (HFC Allocation Framework Rule), EPA issued allowances on October 1, 2021, to companies that had provided data on their historic import and production of HFCs, as well as entities that use HFCs in six applications specified by Congress. EPA also established the set-aside pool of allowances for a limited set of end users and importers (see 86 FR 55116). The set-aside pool of allowances was established for three groups: end users that qualify for application-specific allowances; existing importers that were not required to report under 40 CFR part 98 (i.e., the Greenhouse Gas Reporting Program); and new market entrants. New Era Group submitted an application for set-aside allowances as a new market entrant. The regulatory language specifies that set-aside allowances are available for entities "who are newly importing regulated substances, do not share corporate or common ownership, corporate affiliation in the past five years, or familial relations with entities receiving allowances through this rule." 40 CFR § 84.15(c)(2). EPA also explained in the final rule that new market entrants may include companies that had previously imported HFCs in any prior year but exited the business by 2020 and who did not otherwise qualify to receive general pool allowances (see 86 FR 55157).

After reviewing New Era Group's set-aside application and supporting information available to the Agency, EPA has determined that New Era Group is not eligible for allowances under the set-aside pool as a new market entrant and is therefore denying New Era Group's application. Based on the information before the Agency, EPA has determined that New Era Group does "share corporate or common ownership, corporate affiliation in the past five years, or familial relations" with an entity receiving allowances through this rule, specifically RMS of Georgia. Public data available to the Agency from the State of Georgia Secretary of State confirms that you and the owner of a company who received allowances under the final HFC Allocation Framework Rule are both listed as officers for "New Era Group Inc" as recently as 2019. This equates to corporate affiliation in the past five years with an entity receiving allowances through this rule, and therefore disqualifies New Era Group's application in accordance with EPA's regulations.

Further, the application submitted for new market entrant set-aside allowances was incomplete. EPA regulations at 40 CFR § 84.15(d)(2) require applicants "to be eligible for consideration" to provide "the complete ownership of the company (with percentages of ownership)" 40 CFR § 84.15(d)(2)(i). After Agency outreach explaining the relevant requirements, information submitted by the applicant failed to show the complete ownership of the company (with percentages of ownership). New Era Group also failed to provide as part of its application, "The date of incorporation and State in which the company is incorporated" 40 CFR § 84.15(d)(2)(iv), and the "State license identifier" 40 CFR § 84.15(d)(2)(v). For these reasons, EPA is denying New Era Group's application.

As of January 1, 2022, if New Era Group chooses to import any of the HFCs listed at 40 CFR Part 84 Appendix A, or blends containing any of those HFCs, the company will need to acquire allowances from another allowance holder by the time of import.

If you have questions about the content of this letter, please contact us at <u>HFCAllocation@epa.gov</u>. More information about the regulatory requirements, including fact sheets, frequently asked questions, and a list of existing allowance holders is available at https://www.epa.gov/climate-hfcs-reduction.

Sincerely,

Cynthia A. Newberg

Director, Stratospheric Protection Division



you mail to EPA, mark the outside of the disk or CD-ROM as CBI and then identify electronically within the disk or CD-ROM the specific information that is claimed as CBI. In addition to one complete version of the comment that includes information claimed as CBI, a copy of the comment that does not contain the information claimed as CBI must be submitted for inclusion in the public docket. Information so marked will not be disclosed except in accordance with procedures set forth in 40 CFR part 2.

- 2. Tips for preparing your comments. When preparing and submitting your comments, see the commenting tips at https://www.epa.gov/dockets/comments.html.
- 3. Environmental justice. EPA seeks to achieve environmental justice, the fair treatment and meaningful involvement of any group, including minority and/or low-income populations, in the development, implementation, and enforcement of environmental laws, regulations, and policies. To help address potential environmental justice issues, the Agency seeks information on any groups or segments of the

population who, as a result of their location, cultural practices, or other factors, may have atypical or disproportionately high and adverse human health impacts or environmental effects from exposure to the pesticides discussed in this document, compared to the general population.

II. Background

Registration review is EPA's periodic review of pesticide registrations to ensure that each pesticide continues to satisfy the statutory standard for registration, that is, the pesticide can perform its intended function without unreasonable adverse effects on human health or the environment. As part of the registration review process, the Agency has completed proposed interim decisions for spirodiclofen. Through this program, EPA is ensuring that each pesticide's registration is based on current scientific and other knowledge, including its effects on human health and the environment.

III. Authority

EPA is conducting its registration review of spirodiclofen pursuant to section 3(g) of the Federal Insecticide,

Fungicide, and Rodenticide Act (FIFRA) and the Procedural Regulations for Registration Review at 40 CFR part 155, subpart C. Section 3(g) of FIFRA provides, among other things, that the registrations of pesticides are to be reviewed every 15 years. Under FIFRA, a pesticide product may be registered or remain registered only if it meets the statutory standard for registration given in FIFRA section 3(c)(5) (7 U.S.C. 136a(c)(5)). When used in accordance with widespread and commonly recognized practice, the pesticide product must perform its intended function without unreasonable adverse effects on the environment; that is, without any unreasonable risk to man or the environment, or a human dietary risk from residues that result from the use of a pesticide in or on food.

IV. What action is the Agency taking?

Pursuant to 40 CFR 155.58, this notice announces the availability of EPA's proposed interim decision for spirodiclofen as shown in the following table and opens a 60-day public comment period on the proposed interim registration review decision.

TABLE—PROPOSED INTERIM DECISION BEING MADE AVAILABLE FOR PUBLIC COMMENT

Registration review case name and number	Docket ID No.	Chemical review manager and contact information
Spirodiclofen (Case 7443)	EPA-HQ-OPP-2014-0262	Veronica Dutch, dutch.veronica@epa.gov, (202) 566-2352.

The registration review docket for a pesticide includes earlier documents related to the registration review case. For example, the review opened with a Preliminary Work Plan, for public comment. A Final Work Plan was placed in the docket following public comment on the Preliminary Work Plan.

The documents in the docket describe EPA's rationales for conducting additional risk assessments for the registration review of spirodiclofen, as well as the Agency's subsequent risk findings and consideration of possible risk mitigation measures. This proposed interim registration review decision is supported by the rationale included in those documents. Following public comment, the Agency will issue an interim or final registration review decision for spirodiclofen.

The registration review final rule at 40 CFR 155.58(a) provides for a minimum 60-day public comment period on all proposed interim registration review decisions. This comment period is intended to provide an opportunity for public input and a mechanism for initiating any necessary amendments to

the proposed interim decision. All comments should be submitted using the methods in **ADDRESSES** and must be received by EPA on or before the closing date. These comments will become part of the docket for spirodiclofen. Comments received after the close of the comment period will be marked "late." EPA is not required to consider these late comments.

The Agency will carefully consider all comments received by the closing date and may provide a "Response to Comments Memorandum" in the docket. The interim registration review decision will explain the effect that any comments had on the interim decision and provide the Agency's response to significant comments.

Background on the registration review program is provided at: https://www.epa.gov/pesticide-reevaluation.

(Authority: 7 U.S.C. 136 et seq.)

Dated: March 30, 2022.

Mary Elissa Reaves,

Director, Pesticide Re-Evaluation Division, Office of Pesticide Programs.

[FR Doc. 2022–07076 Filed 4–4–22; 8:45 am]

BILLING CODE 6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[EPA-HQ-OAR-2021-0669; FRL-9116-02-OAR]

Phasedown of Hydrofluorocarbons: Notice of 2022 Set-Aside Pool Allowance Allocations for Production and Consumption of Regulated Substances Under the American Innovation and Manufacturing Act of 2020

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

SUMMARY: The Environmental Protection Agency (EPA) is providing notice that on March 31, 2022, the Agency issued hydrofluorocarbon allowances to applicants that met the applicable

criteria from the set-aside pool established in EPA's 2021 final rule titled *Phasedown of* Hydrofluorocarbons: Establishing the Allowance Allocation and Trading Program under the American Innovation and Manufacturing Act. In accordance with this final rule, the Agency redistributed allowances remaining in the set-aside pool to entities that received general pool production and consumption allowances on October 1, 2021. Both the set-aside allocation and the general pool reallocation were announced on the Agency's website on March 31, 2022, and entities were notified either by letter or electronic mail of the allocation decisions. The Agency also provided notice to certain companies on March 31, 2022, that the Agency intends to retire an identified set of those companies' allowances in accordance with the administrative consequences provisions established in the final rule.

FOR FURTHER INFORMATION CONTACT:

Andy Chang, U.S. Environmental Protection Agency, Stratospheric Protection Division, telephone number: 202–564–6658; email address: chang.andy@epa.gov. You may also visit EPA's website at https://www.epa.gov/climate-hfcs-reduction for further information.

SUPPLEMENTARY INFORMATION: In EPA's rulemaking titled Phasedown of Hydrofluorocarbons: Establishing the Allowance Allocation and Trading Program under the American Innovation and Manufacturing Act (86 FR 55116, Oct. 5, 2021), EPA established a setaside pool of allowances and codified at 40 CFR 84.15 criteria related to eligibility for the set-aside pool allowances, and how EPA would determine the level of allowances to allocate to each eligible entity. On March 31, 2022, EPA issued allowance allocations consistent with this section and posted the updated list of allowance holders on its website at https:// www.epa.gov/climate-hfcs-reduction. The set-aside pool was established for three general categories of applicants: Application-specific end users (40 CFR 84.15(b)(1)), entities that imported regulated substances 1 in 2020 that were not required to report under 40 CFR part 98 (i.e., the Greenhouse Gas Reporting Program (GHGRP)) and were not issued allowances as of October 1, 2021 (40

CFR 84.15(c)(1)), and new market entrants (40 CFR 84.15(c)(2)).

Under 40 CFR 84.15, applicationspecific allowances from the set-aside pool are subject to the same conditions for such allowances in 40 CFR 84.13. These allowances are drawn from both the production and consumption setaside allowance pools, and EPA is issuing application-specific allowances from the set-aside pool to applicants that qualify as end users in the applications established by the American Innovation and Manufacturing (AIM) Act. The following applications were eligible for application-specific allowances under the set-aside pool: Propellants in metered dose inhalers (MDI), defense sprays, structural composite preformed polyurethane foam for marine use and trailer use, etching of semiconductor material or wafers and the cleaning of chemical vapor deposition chambers within the semiconductor manufacturing sector, and onboard aerospace fire suppression.

Consistent with the provisions in 40 CFR 84.15, EPA has allocated set-aside pool application-specific allowances to the entities listed in Table 1.

TABLE 1—SET-ASIDE APPLICATION-SPECIFIC ALLOWANCES FOR CALENDAR YEAR 2022

Applicant	Application	Number of application-specific allowances issued (MTEVe)
Armstrong Pharmaceuticals AstraZeneca Pharmaceuticals Aurobindo Pharma USA Invagen Pharmaceuticals Odin Pharmaceuticals Wabash National Corporation IBM Corporation NXP Semiconductor The Research Foundation for The State University of New York OBO SUNY Polytechnic Institute. SkyWater Technology Skyworks Solutions Proteng Distribution	Metered Dose Inhalers Structural Composite Foam Semiconductors Semiconductors Semiconductors Semiconductors Semiconductors Semiconductors Onboard aerospace fire suppression	111,059.3 2,122.7 71,177.4 28,121.3 9,473.8 36,686.6 1,440.0 5,040.8 1,245.4 15,689.3 6,978.5
Total	Onboard derospace line suppression	301,110.1

EPA received three applications by the deadline of December 6, 2021, for allowances under the second set-aside category. Under the provisions at 40 CFR 84.15(c)(1), in order to be eligible for this category an applicant had to:

- (1) Import regulated substances in 2020;
- (2) not be required to report under 40 CFR part 98 (*i.e.*, the GHGRP); and

(3) not receive allowances from EPA on October 1, 2021.

All three applicants, MEK Chemical Corporation, Siemens Industry, and Wegochem International, were denied allowances because they are ineligible under 40 CFR 84.15(c)(1). The entities were required to report to the GHGRP under 40 CFR part 98.

Under the third set-aside category, for new market entrants, 45 entities

regulated substance by the Administrator under the authority granted in subsection (c)(3). The list of

submitted applications by the deadline of December 6, 2021. EPA is denying applications from seven entities, CAILLECH LLC, ChemPenn, LLC, ComStar International Inc., ISOSTU LLC, J&J AC Supply Inc, Kim Stilwell, and Peter Williams DBA New Era Group, because they are ineligible under 40 CFR 84.15(c)(2). The applicants were ineligible for at least one of the following reasons:

regulated substances is available at Appendix A to 40 CFR part 84.

¹ Regulated substance means a hydrofluorocarbon listed in the table contained in subsection (c)(1) of the AIM Act and a substance included as a

- (1) Did not submit complete applications,
- (2) were not newly importing regulated substances, or
- (3) shared corporate or common ownership, corporate affiliation in the past five years, or familial relations with entities receiving allowances on October 1, 2021.

Consistent with the provisions in 40 CFR 84.15, EPA has allocated allowances for new market entrants to the entities listed in Table 2.

TABLE 2—SET-ASIDE NEW MARKET ENTRANT ALLOWANCES FOR CALENDAR YEAR 2022

Applicant name	Number of consumption allowances issued (MTEVe)
Ability Refrigerants	200,000.0
A.C.S. Reclamation & Recovery (Absolute Chiller Services)	200,000.0
ACT Commodities	77.8
Advance Auto Parts	190,699.1
AFK & Co	193,335.9
AFS Cooling	200.000.0
AllCool Refrigerant Reclaim	200,000.0
American Air Components	200,000.0
Automart Distributors DBA Refrigerant Plus	200,000.0
CC Packaging	194,000.0
Certified Refrigerant Services	200.000.0
Chemp Technology	200,000.0
Creative Solution	200,000.0
Cross World Group	200,000.0
EDX Industry	200,000.0
Fireside Holdings DBA American Refrigerants	199,978.5
Freskoa USA	200.000.0
Golden Refrigerant	200,000.0
Hungry Bear	200,000.0
Kidde-Fenwal	200,000.0
Lina Trade	200,000.0
	200,000.0
Meraki Group	161.000.0
Metalcraft	200.000.0
North American Refrigerants	200,000.0
O23 Energy Plus	
Perfect Score Too DBA Perfect Cycle	37,876.0
Reclamation Technologies	200,000.0
RTR Suppliers	198,000.0
Saalok	200,000.0
Sciarra Laboratories	8,700.0
SDS Refrigerant Services	200,000.0
Summit Refrigerants	200,000.0
SynAgile Corporation	1,125.1
TradeQuim	200,000.0
Tyco Fire Products	200,000.0
USA United Suppliers of America DBA USA Refrigerants	200,000.0
USSC Acquisition Corp	131,451.0
Wesco HMB	200,000.0
Total	6,716,243.4

EPA notes the restrictions in 40 CFR 84.15(e)(3) that new market entrants are allocated up to 0.2 MMTEVe (200,000 MTEVe) for calendar year 2022. Accordingly, entities that requested more than 200,000 MTEVe as a new market were allocated the regulatory

maximum of 200,000 MTEVe. And, in accordance with 40 CFR 84.15(f)(1) set-aside allowances allocated to new market entrants cannot be transferred.

After making the allocations noted in Tables 1 and 2, there were 2,198,889.9 production allowances and 482,646.5 consumption allowances remaining in

the set-aside pool. In accordance with 40 CFR 84.15(e)(4), those allowances have been distributed to the October 1, 2021, general pool allowance holders on a pro rata basis. EPA has made this pro rata distribution as shown in Tables 3 and 4.

TABLE 3—SET-ASIDE PRODUCTION ALLOWANCES DISTRIBUTED PURSUANT TO 40 CFR 84.15(e)(4)

Entity	Number of production allowances issued (MTEVe)
Arkema	265,221.2 491,227.0 1,114,441.9

TABLE 3—SET-ASIDE PRODUCTION ALLOWANCES DISTRIBUTED PURSUANT TO 40 CFR 84.15(e)(4)—Continued

Entity	Number of production allowances issued (MTEVe)
Iofina Chemical	11.4 327,988.4

TABLE 4—SET-ASIDE CONSUMPTION ALLOWANCES DISTRIBUTED PURSUANT TO 40 CFR 84.15(e)(4)

Entity	Number of consumption allowances issued (MTEVe) 1
A-Gas	5,926.5
Advanced Specialty Gases	526.9
Air Liauide USA	920.6
Altair Partners	5,390.0
Arkema	57,387.2
Artsen	1,897.6
AutoZone Parts	4,592.1
AW Product Sales & Marketing	359.2
Bluon	61.8
Chemours	61,647.9
Combs Gas	2,378.4
ComStar International	690.8
Daikin America	5,763.4
Electronic Fluorocarbons	192.6
First Continental International	1,421.7
FluoroFusion Specialty Chemicals	4,713.8
GlaxoSmithKline	990.5
Harp USA	1,413.8
Honeywell International	152,348.3
Hudson Technologies	5,518.1
ICool USA	6,291.7
IGas Holdings	47,912.0
Iofina Chemical	2.3
Lenz Sales & Distribution	2,050.4
Linde	983.4
Mexichem Fluor DBA Koura	47,053.8
Mondy Global	588.6
National Refrigerants	36,577.3
Nature Gas Import and Export	1,513.6
Refrigerants, Inc	49.0
RMS of Georgia	2,994.0
Showa Chemicals of America	135.7
Solvay Fluorides	2,035.9
Technical Chemical	1,798.9
Transocean Offshore Deepwater Drilling	0.0
Tulstar Products	1,355.7
Walmart	4,211.6
Waysmos USA	1,171.7
Weitron	11,705.0
Wilhelmsen Ships Service	74.6

¹ Numbers may not sum due to rounding.

This allocation of set-aside allowances should not be construed to limit the ability of EPA to apply administrative consequences under 40 CFR 84.35, or to limit the ability of the United States to exercise any authority to pursue enforcement action under the AIM Act and 40 CFR part 84, or under other federal laws or regulations.

For example, if future information reveals an entity provided false, inaccurate, or misleading information or did not disclose financial or familial relationships between a new entrant and another allowance holder, EPA may pursue administrative consequences and refer the entity for any and all appropriate enforcement actions.

On March 31, 2022, EPA also provided notice to three entities of the Agency's intent to take administrative consequences in accordance with 40 CFR 84.35 and retire an identified set of those companies' allowances. Using this authority, EPA can retire, revoke, or withhold the allocation of allowances,

or ban a company from receiving, transferring, or conferring allowances.

Judicial Review

The AIM Act provides that certain sections of the Clean Air Act (CAA) "shall apply to" the AIM Act and "any rule, rulemaking, or regulation promulgated by the Administrator of [EPA] pursuant to [the AIM Act] as though [the AIM Act] were expressly included in title VI of [the CAA]." Id. § 7675(k)(1)(C). Among the applicable

sections of the CAA is section 307, id. § 7607, which includes provisions on judicial review. Section 307(b)(1) provides, in part, that petitions for review must be filed in the United States Court of Appeals for the District of Columbia Circuit: (i) When the agency action consists of "nationally applicable regulations promulgated, or final actions taken, by the Administrator," or (ii) when such action is locally or regionally applicable, but "such action is based on a determination of nationwide scope or effect and if in taking such action the Administrator finds and publishes that such action is based on such a determination." For locally or regionally applicable final actions, the CAA reserves to the EPA complete discretion whether to invoke the exception in (ii).

This final action is "nationally applicable" within the meaning of CAA section 307(b)(1). In the alternative, to the extent a court finds this final action to be locally or regionally applicable, the Administrator is exercising the complete discretion afforded to him under the CAA to make and publish a finding that this action is based on a determination of "nationwide scope or effect" within the meaning of CAÂ section 307(b)(1).2 This final action consisted of the Agency issuing hydrofluorocarbon allowances to applicants that met the applicable criteria from the set-aside pool and redistributing allowances remaining in the set-aside pool to entities that received general pool production and consumption allowances on October 1, 2021. The applicants and entities are located throughout the country in varying judicial circuits.3 This final action is based on a common core of factual findings concerning the eligibility of applicants to the set-aside pool. For these reasons, this final action is nationally applicable or, alternatively, the Administrator is exercising the complete discretion afforded to him by the CAA and hereby finds that this final action is based on a determination of nationwide scope or effect for purposes

of CAA section 307(b)(1) and is hereby publishing that finding in the **Federal Register**.

Under section 307(b)(1) of the CAA, petitions for judicial review of this action must be filed in the United States Court of Appeals for the District of Columbia Circuit within 60 days from the date this final action is published in the Federal Register. Filing a petition for reconsideration by the Administrator of this final action does not affect the finality of the action for the purposes of judicial review, nor does it extend the time within which a petition for judicial review must be filed and shall not postpone the effectiveness of such rule or action.

Hans Christopher Grundler,

Director, Office of Atmospheric Programs. [FR Doc. 2022–07152 Filed 4–4–22; 8:45 am] BILLING CODE 6560–50–P

FEDERAL RESERVE SYSTEM

Formations of, Acquisitions by, and Mergers of Bank Holding Companies

The companies listed in this notice have applied to the Board for approval, pursuant to the Bank Holding Company Act of 1956 (12 U.S.C. 1841 et seq.) (BHC Act), Regulation Y (12 CFR part 225), and all other applicable statutes and regulations to become a bank holding company and/or to acquire the assets or the ownership of, control of, or the power to vote shares of a bank or bank holding company and all of the banks and nonbanking companies owned by the bank holding company, including the companies listed below.

The public portions of the applications listed below, as well as other related filings required by the Board, if any, are available for immediate inspection at the Federal Reserve Bank(s) indicated below and at the offices of the Board of Governors. This information may also be obtained on an expedited basis, upon request, by contacting the appropriate Federal Reserve Bank and from the Board's Freedom of Information Office at https://www.federalreserve.gov/foia/ request.htm. Interested persons may express their views in writing on the standards enumerated in the BHC Act (12 U.S.C. 1842(c)).

Comments regarding each of these applications must be received at the Reserve Bank indicated or the offices of the Board of Governors, Ann E. Misback, Secretary of the Board, 20th Street and Constitution Avenue NW, Washington DC 20551–0001, not later than May 5, 2022.

- A. Federal Reserve Bank of Chicago (Colette A. Fried, Assistant Vice President) 230 South LaSalle Street, Chicago, Illinois 60690–1414:
- 1. Bank First Corporation, Manitowoc, Wisconsin; to acquire Denmark Bancshares, Inc., and thereby indirectly acquire Denmark State Bank, both of Denmark, Wisconsin.
- A. Federal Reserve Bank of St. Louis (Holly A. Rieser, Manager) P.O. Box 442, St. Louis, Missouri 63166–2034. Comments can also be sent electronically to

Comments.applications@stls.frb.org:

1. Omni Bank Group, Inc., Little Rock, Arkansas; to become a bank holding company by acquiring Community State Bank, Bradley, Arkansas.

Board of Governors of the Federal Reserve System, March 31, 2022.

Michele Taylor Fennell,

Deputy Associate Secretary of the Board. [FR Doc. 2022–07164 Filed 4–4–22; 8:45 am] BILLING CODE P

FEDERAL RESERVE SYSTEM

Agency Information Collection Activities: Announcement of Board Approval Under Delegated Authority and Submission to OMB

AGENCY: Board of Governors of the Federal Reserve System.

SUMMARY: The Board of Governors of the Federal Reserve System (Board) is adopting a proposal to extend for three years, without revision, the Procurement Solicitation Package (FR 1400; OMB No. 7100–0180).

FOR FURTHER INFORMATION CONTACT:

Federal Reserve Board Clearance Officer—Nuha Elmaghrabi—Office of the Chief Data Officer, Board of Governors of the Federal Reserve System, Washington, DC 20551, (202) 452–3829.

Office of Management and Budget (OMB) Desk Officer for the Federal Reserve Board, Office of Information and Regulatory Affairs, Office of Management and Budget, New Executive Office Building, Room 10235, 725 17th Street NW, Washington, DC 20503, or by fax to (202) 395–6974.

SUPPLEMENTARY INFORMATION: On June 15, 1984, OMB delegated to the Board authority under the Paperwork Reduction Act (PRA) to approve and assign OMB control numbers to collections of information conducted or sponsored by the Board. Boardapproved collections of information are incorporated into the official OMB inventory of currently approved collections of information. The OMB

² In deciding whether to invoke the exception by making and publishing a finding that this final action is based on a determination of nationwide scope or effect, the Administrator has also taken into account a number of policy considerations, including his judgment balancing the benefit of obtaining the D.C. Circuit's authoritative centralized review versus allowing development of the issue in other contexts and the best use of Agency resources.

³ In the report on the 1977 Amendments that revised section 307(b)(1) of the CAA, Congress noted that the Administrator's determination that the "nationwide scope or effect" exception applies would be appropriate for any action that has a scope or effect beyond a single judicial circuit. See H.R. Rep. No. 95–294 at 323, 324, reprinted in 1977 U.S.C.C.A.N. 1402–03.

J. Gordon Arbuckle, Esq.

2550 M Street NW Washington, DC 20037 T + 1 202 775 2025 M + 1 303 619 5123 gordona123@earthlink.net

April 20, 2022

Cynthia A. Newburg Director, Stratospheric Protection Division United States Environmental Protection Agency Office of Air and Radiation Washington, DC 20460

Via Email: <u>HFCAllocation@EPA.gov</u>

Dear Ms. Newberg:

I am writing on behalf of Peter Williams (dba The New Era Group) in response to your letter dated March 31, 2022. The representation is being provided without fee because I believe a substantial injustice has occurred due to the Agency's failure to give Mr. Williams proper notice of the purported basis for its eligibility determination and a resultant major misunderstanding by the agency of the relevant facts of this matter. Let me begin by requesting from you a complete copy of the administrative record on this matter, including a copy of the "information before the Agency" which was relied upon in reaching the conclusion that this applicant does (or did) "share corporate or common ownership, corporate affiliation in the past five years or familial relations" with RMS of Georgia – a company receiving allowances under the rule as well as any legal opinion supporting the legal conclusion that an individual is a "company" which must state its ownership in the required application.

FACTS

Peter Williams, as an individual, commenced business as "The New ERA Group" sometime in 2008. He has continued to do business in that capacity up to the present date. Sometime in 2014, Mr. Williams participated in the formation of an informal membership organization operating under the style "New Era Group" which was formed for the purpose of prosecuting a judicial appeal of an EPA ruling which the group believed to be erroneous. The group operated by consensus and was not controlled by any member or member company. Mr. Williams and his employees acted as coordinator and assisted in administration of the organization.

In May of 2014, *New Era Group Inc* was established for the purpose of providing a corporate identity for the *New Era Group* membership organization and establishing its nonprofit status.² Mr. Ken Ponder and

¹ Some of the confusion in this matter may stem from the fact that at the time Mr. Williams commenced business in 2008, he intended to establish and operate as a corporation. Accordingly, he had cards and letterhead printed and established an e-mail address including "inc" as part of the address. Unfortunately, Mr. Williams has never had sufficient resources to fund his corporate intentions or establish any other form of business entity. Accordingly, he has operated in fact as an individual—a fact clearly disclosed in his application. I have advised Mr. Williams to remove the word "inc" from all such papers and communications and he is doing so.

² The Articles provide that "The purpose of NEW ERA GROUP INC is to assist with the education and environmental defense of any harmful and/or negative environmental impacts. These educational and defense efforts include, but are not limited to exposing governmental agencies, public service companies and chemical producing businesses that may have products, by-products or policies that may negatively impact pour quality of life."

his family were the sole shareholders and sole officers with control or managerial authority. Mr. Williams was designated as "Fundraising Chair" to authorize him to continue his administrative support functions for the ongoing litigation. Those services ended sometime in early 2015. "Fundraising Chair" is not a legally defined corporate office and nothing in the Articles or Bylaws grants to Mr. Williams any power or managerial authority. Mr. Williams administrative functions were completed in early 2015, with conclusion of the litigation and a decision not to appeal.

Since that time, Mr. Williams has had no official function with *New Era Group, Inc.* He has exercised no control or management authority and he received no notice of nor access to any of that corporation's official filings, records or business dealings. He received no notice of, nor has he participated in, any corporate meetings.

In March of 2016, Mr. Williams, having heard nothing from *New Era Group Inc.* for nearly two years, submitted to the owners and their accountant repeated demands for the company's corporate records. On receipt of some of those records, he concluded that, without his knowledge, the company was apparently being operated as a for profit entity and that, without his consent, he had been designated CEO of the Company. He immediately gave notice to both the owners and the Internal Revenue Service of his denial of involvement with either the *New Era Group Inc.* or its owners after May of 2014 and has had no dealings with *New Era Group Inc.*, other than the referenced notice, since that time.³

ANALYSIS AND CONCLUSIONS

Based on the facts set out above, which are supported by the attached sworn affidavit and supporting materials, though due to limited resources and failure to fully appreciate the details of certain legal obligations, Mr. Williams has not always precisely understood his legal status, has allowed himself to be exploited by others and has allowed EPA to misconstrue his legal status, *it is clear that:*

- 1. Peter Williams (dba The New Era Group) and *The New Era Group, Inc.*, are separate persons as defined in the Section 84.3 "any individual or legal entity including an individual, corporation..."
- 2. Peter Williams does not "share corporate or common ownership" in New Era Group, Inc., any owner of that company, any company affiliated with that company, any member of the Ponder family, any company owned in whole or in part by any member of the Ponder family, RMS of Georgia or any entity affiliated with that company.
- 3. Peter Williams has never "shared corporate affiliation" with *RMS of Georgia*. First, as the above cited definition makes clear, an individual is not a corporation and thus any affiliation an individual may have, cannot be corporate. Second, although part 84 does not define "affiliate", the term in governmental contexts clearly means "controlling, controlled by or under common control with". Peter Williams has never exerted any degree of control over *New Era Group Inc.*, *RMS of Georgia* or any of the persons or entities itemized in Conclusion 2 above.
- 4. Neither the *New Era Group Inc.*,⁵ nor any person nor entity with which Peter Williams has been affiliated in the last five years, or most probably ever, has, to Mr. Williams' knowledge or within Mr. Williams' knowledge and control or during the time when Mr. Williams held a non-managerial title, received allowances under the final HFC allocation rule. Any such allocations which may have been received were illegally granted and illegally received.

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³ Mr. Williams, as an individual, did do some independent consulting work for certain of the RMS group of companies but never held an equity interest of exerted any control over any of them.

⁴ The language appears to refer to interlocking or affiliated corporations. Otherwise it would simply refer to "affiliation".

⁵ As noted above, *New Era Group, Inc.* was never legally authorized to receive or sell allowances.

- 5. As the "person" definition makes clear, an individual is not an entity, a corporation or a company. The parts of section 84.15 referenced in your letter are simply inapplicable to individuals and the conclusion based on those sections is in error.
- 6. Peter Williams has been denied administrative due process in this matter in that the decision was based on evidence outside the record which was not disclosed to Applicant. Nor was Applicant given an opportunity to respond to or rebut this evidence or the erroneous conclusions based thereon.

REQUEST FOR RELIEF

While I am aware that Peter Williams has been a vocal critic of certain agency actions and is perhaps not the most popular person within the Agency, and that the application he submitted may not be the most artful the Agency has seen. I am also aware that HFC Allocations are jealously guarded, and that past HFC recipients do not favor new applicants. Finally, I am painfully aware that a person of color has never received an HFC allocation, that this person of color has been taken advantage of by a member of the HFC community and that that factor has substantially affected your decision in this matter.

I ask that you review your decision and revise it consistent with the facts stated herein.

Please advise me of Mr. Williams' Rights of Appeal in the event an appeal is necessary.

Thank you for your attention,

J Gordon Arbuckle, Esq.

AFFIDAVIT OF PETER WILLIAMS

I am Peter Williams. I reside at 709 Pickering Drive, Unit B, Murrells Inlet, South Carolina, 29567.

The following statements are true to the best of my knowledge and belief:

- 1. I have been engaged in business and advisory services related to the production and sale of chlorinated CFCs, HCFCs and HFCs since 1993
- 2. I then commenced business as "the New Era Group" sometime in 2008.
- 3. At the time I commenced operating as the New Era Group, I intended to establish a corporation and operate through that Corporation. Accordingly, I established an email address and had cards and letterhead printed including the abbreviation "inc". Unfortunately, I have never had available funds to establish a corporation but have erroneously continued to use that email address and those materials.
- 4. I have operated as "Peter Williams (d/b/a The New Era Group).
- 5. Sometime in 2014, I participated with a number of other companies in the industry in the formation of an informal membership organization operating under the style "New Era Group" for the purpose of prosecuting a judicial appeal of an EPA Ruling which we believe to be erroneous.
- The group operated by consensus and was not controlled by any member or member company. I am an employee acted as coordinators and assisted in administration.
 - In May of 2014, Mr. Ken Ponder established the New Era Group, Inc. for the purpose of
 providing a corporate identity for the New Era Group, Inc. membership organization and
 establishing its non-profit status.
 - 8. Mr. Ken Ponder and his families were the sole shareholders and offices with control for managerial authority. I was designated as "fund raising chair" in order that I might continue to perform administrative support functions for the ongoing litigation.
 - 9. My litigation support services ended sometime in early 2015. Since that time, I have performed no official functions or services for the New Era Group, Inc. I have never exercised any control or management authority in that Company and since May of 2014 have received no notice of nor access to the Corporation's official filings, records or business dealings. I have never received notice of any meeting other than the May organization meeting have never participated in any other Corporate meetings.
 - 10. In March of 2016, having heard nothing from New Era Group, Inc. for nearly two (2) years, I repeated demanded from their owners and their accountants, copies of relevant corporate records. Based on the records I did receive, pursuant to those demands, I

concluded that without my knowledge the Company was apparently being operated as a "for profit" entity, without my knowledge and consent, I have been designed in Corporate filings as "CEO" of the Company.

- 11. I immediately gave notice to both the owners and the Internal Revenue Service that I denied involvement with the New Era Group, Inc. or matters within its scope of authority after May of 2014.
- 12. I have had no dealings with the New Era Group, Inc. other than the above referenced demands and notice since that time.
- 13. I acknowledge that I did do some independent consulting work for certain of the RMS group of companies but never held an equity interest of exerted any control over any of them.
- 14. I have attached to this Affidavit copies of selected documents that support the statements made herein.

I, Peter Williams, affirm the above statements are true to the best of my knowledge.

Subscribed and sworn before me this 20th day of Apri STATE OF COUNTY OF Subscribed, sworn to and acknowledged before me by , the agent, on 4 Witness my hand and official seal. My commission expire [SEAL] J DILLON SANDERS Notary Public State of South Caroling Commission Expires Seb 4, 2024



will not be included in the public docket and should not be submitted through www.regulations.gov or email. For additional information about the EPA's public docket visit the EPA Docket Center homepage at http://www.epa.gov/dockets/.

Public Docket: Publicly available docket materials may be accessed Online at www.regulations.gov.

FOR FURTHER INFORMATION CONTACT: The Designated Federal Officer (DFO), Tom Tracy, via phone/voicemail at: 919–541–4334; or via email at: *tracy.tom@epa.gov.*

Any member of the public interested in receiving a draft agenda, attending the meeting, or making a presentation at the meeting should contact Tom Tracy no later than October 23, 2022.

SUPPLEMENTARY INFORMATION: The Board of Scientific Counselors (BOSC) is a federal advisory committee that provides advice and recommendations to EPA's Office of Research and Development on technical and management issues of its research programs. The meeting agenda and materials will be posted to https://www.epa.gov/bosc.

Proposed agenda items for the meeting include, but are not limited to, the following: review of the New Chemicals Collaborative Research Program.

Information on Services Available: For information on translation services, access, or services for individuals with disabilities, please contact Tom Tracy at 919–541–4334 or tracy.tom@epa.gov. To request accommodation of a disability, please contact Tom Tracy at least ten days prior to the meeting to give the EPA adequate time to process your request.

Authority: Pub. L. 92–463, 1, Oct. 6, 1972, 86 Stat. 770.

Mary Ross,

Director, Office of Science Advisor, Policy and Engagement.

[FR Doc. 2022-22046 Filed 10-7-22; 8:45 am]

BILLING CODE 6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[EPA-HQ-OAR-2021-0669; FRL-9116-03-OAR]

Phasedown of Hydrofluorocarbons: Notice of 2023 Allowance Allocations for Production and Consumption of Regulated Substances Under the American Innovation and Manufacturing Act of 2020

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

SUMMARY: The Environmental Protection Agency (EPA) has issued calendar year 2023 allowances for the production and consumption of hydrofluorocarbons in accordance with the Agency's regulations as established in the 2021 final rule titled Phasedown of Hydrofluorocarbons: Establishing the Allowance Allocation and Trading Program under the American Innovation and Manufacturing Act. The American Innovation and Manufacturing Act directs the Environmental Protection Agency by October 1 of each calendar year to determine the quantity of production and consumption allowances for the following calendar year. The Agency also provided notice to certain companies on September 30, 2022, that the Agency intends to retire an identified set of those companies' allowances in accordance with the administrative consequences provisions established in the final rule.

FOR FURTHER INFORMATION CONTACT:

Andy Chang, U.S. Environmental Protection Agency, Stratospheric Protection Division, telephone number: 202–564–6658; email address: chang.andy@epa.gov. You may also visit EPA's website at https://www.epa.gov/climate-hfcs-reduction for further information.

SUPPLEMENTARY INFORMATION:

Subsection (e)(2)(D)(i) of the American Innovation and Manufacturing Act of 2020 (AIM Act) directs the Environmental Protection Agency (EPA) to determine, by October 1 of each calendar year, the quantity of allowances for the production and consumption of regulated substances that may be used for the following calendar year. EPA has codified the production and consumption baselines and phasedown schedules for regulated substances in 40 CFR 84.7. Under the

phasedown schedule, for 2023, total production allowances may not exceed 344,299,157 metric tons of exchange value equivalent (MTEVe) and total consumption allowances may not exceed 273,498,315 MTEVe.

EPA regulations at 40 CFR part 84, subpart A, outline the process by which the Agency determines the number of allowances each entity is allocated. EPA allocated allowances consistent with this process for calendar year 2023, and has posted entity-specific allowance allocations on its website at https://www.epa.gov/climate-hfcs-reduction. An allowance allocated under the AIM Act does not constitute a property right and is a limited authorization for the production or consumption of a regulated substance.

EPA has codified the procedure for calculating application-specific allowance allocations in 40 CFR 84.13. These allowances are drawn from both the production and consumption allowance pools. EPA is issuing "application-specific allowances" to end users in five applications established by the AIM Act: propellants in metered dose inhalers, defense sprays, structural composite preformed polyurethane foam for marine use and trailer use, etching of semiconductor material or wafers and the cleaning of chemical vapor deposition chambers within the semiconductor manufacturing sector, and onboard aerospace fire suppression. Additionally, EPA is issuing "application-specific allowances" to the U.S. Department of Defense for missioncritical military end uses.

EPA has denied requests for application-specific allowances from Applied Materials, Inc; Benuvia Manufacturing; General Electric Global Research Center; Gilero LLC; Guardian Protective Devices, Inc.; nHalience LLC; and Shamrock Filling LLC because they are ineligible under 40 CFR 84.13. The requests were ineligible for at least one of the following reasons:

- (1) Did not meet the criteria for HFC use in a covered application;
 - (2) Did not submit by the deadline;
- (3) Did not provide proper supporting documentation or justification for their requests; or
- (4) Did not report purchases of regulated substances in the past three years.

EPA has allocated 2023 applicationspecific allowances as shown in Table 1.

TABLE 1—APPLICATION-SPECIFIC ALLOWANCES FOR CALENDAR YEAR 2023

Entity	Application	Number of application- specific allowances issued (MTEVe) 1
Analog Devices	Semiconductors	28,852.2
Apple	Semiconductors	1,033.8
Armstrong Pharmaceuticals	Metered Dose Inhalers	157,231.4
ASML US	Semiconductors	1,237.2
AstraZeneca Pharmaceuticals	Metered Dose Inhalers	4,652.7
Aurobindo Pharma USA	Metered Dose Inhalers	65,427.9
Broadcom	Semiconductors	834.7
Compsys	Structural Composite Foam	14.152.8
Defense Technology	Defense Sprays	9,366.7
Diodes Incorporated	Semiconductors	3,667.1
GlobalFoundries	Semiconductors Semiconductors	177,721.8
Hitachi High-Tech America	Semiconductors	1,064.4
IBM Corporation	Semiconductors	533.5
Intel Corporation	Semiconductors	746,212.5
InvaGen Pharmaceuticals	Metered Dose Inhalers	74,380.1
Jireh Semiconductor	Semiconductors	5,787.8
Keysight Technologies	Semiconductors	538.8
Kindeva Drug Delivery	Metered Dose Inhalers	408,952.0
Lupin	Metered Dose Inhalers	24,098.0
Medtronic	Semiconductors	637.6
		31,266.7
Microp Technology	Semiconductors	42,600.7
Micron Technology	Semiconductors	,
Newport Fab DBA TowerJazz	Semiconductors Semiconductors	8,042.3
NXP Semiconductors	Metered Dose Inhalers	86,878.8
Odin Pharmaceuticals		1,708.5
Polar Semiconductor	Semiconductors	13,446.4
Proteng Distribution	Onboard Aerospace Fire Suppression	4,060.4
Qorvo Texas	Semiconductors	1,237.2
Raytheon Technologies	Onboard Aerospace Fire Suppression	952.6
Renesas Electronics America	Semiconductors	4,445.5
Samsung Austin Semiconductor	Semiconductors	384,969.7
Security Equipment Corporation	Defense Sprays	63,889.9
Semiconductor Components Industries DBA ON Semiconductor.	Semiconductors	38,821.5
	Comiconductors	17 540 0
SkyWater Technology	Semiconductors	17,549.8
Skyworks Solutions		4,652.3
Texas Instruments	Semiconductors	194,744.9
The Research Foundation for The State University of New York.	Semiconductors	159.9
Tokyo Electron America	Semiconductors	558.8
Tower Semiconductor San Antonio	Semiconductors	4,948.7
TSMC Arizona Corporation	Semiconductors	32,632.0
UDAP Industries	Defense Sprays	110,727.8
Wabash National Corporation	Structural Composite Foam	73,543.0
WaferTech	Semiconductors	22,355.4
Wolfspeed	Semiconductors	36,114.7
X–FAB Texas	Semiconductors	5,076.0
Zarc International	Defense Sprays	1,384.1
Department of Defense	Mission-critical Military End Uses	2,513,169.3
Total	All	5,426,319.9

¹ Numbers may not sum due to rounding.

EPA has codified the procedure for calculating the production allowance

allocation in 40 CFR 84.9. EPA has

allocated calendar year 2023 production allowances as shown in Table 2.

Table 2—Production Allowances for Calendar Year 2023

Entity	Number of production allowances issued (MTEVe) 1
Application-specific allowances ² Arkema Chemour Honeywell International Iofina Chemical Mexichem Fluor DBA Koura	5,426,319.9 40,873,469.3 75,703,417.3 171,747,616.1 1,758.6 50,546,575.8
Total	344,299,157.0

¹ Numbers may not sum due to rounding. ² See Table 1.

EPA has codified the procedure for calculating the consumption allowance allocation in 40 CFR 84.11. Calendar year 2023 consumption allowances have also been allocated to new market entrants consistent with 40 CFR 84.15.1

EPA has allocated calendar year 2023 consumption allowances as shown in Table 3.

TABLE 3—CONSUMPTION ALLOWANCES FOR CALENDAR YEAR 2023

Entity	Number of consumption allowances issued (MTEVe) 1
Application-specific allowances ²	5,426,319.9
A.C.S. Reclamation & Recovery (Absolute Chiller Services)*	200,000.0
Ability Refrigerants *	200,000.0
ACT Commodities *	77.8
Advance Auto Parts *	190.699.1
Advanced Specialty Gases	285,314.5
	193.335.9
AFK & Co. *	200,000.0
A-Gas	3,209,232.5
Air Liquide USA	498,530.3
AllCool Refrigerant Reclaim*	200,000.0
Altair Partners	2,918,730.4
American Air Components *	200,000.0
Arkema	31,075,488.7
Artsen	1,027,571.2
Automart Distributors DBA Refrigerant Plus *	200,000.0
AutoZone Parts	2,486,664.3
AW Product Sales & Marketing	194,505.7
Bluon	33,459.8
CC Packaging *	194,000.0
Certified Refrigerant Services*	200,000.0
Chemours	33,382,686.1
Chemp Technology*	200,000.0
Combs Gas	1,287,918.3
ComStar International	374,063.9
Creative Solution*	200,000.0
Cross World Group *	200,000.0
Daikin America	3.120.932.2
EDX Industry*	200,000.0
Electronic Fluorocarbons	104,289.0
Fireside Holdings DBA American Refrigerants*	199,978.5
First Continental International	769,838.0
FluoroFusion Specialty Chemicals	2,552,532.6
Freskoa USA *	200,000.0
GlaxoSmithKline	536,367.9
	200,000.0
Golden Refrigerant*	
Harp USA	765,574.0
Honeywell International	82,497,424.7
Hudson Technologies	2,988,057.5
Hungry Bear*	200,000.0
ICool USA	3,406,995.9
IGas Holdings	25,944,614.3
lofina Chemical	1,264.9
Kidde-Fenwal*	200,000.0
Lenz Sales & Distribution	1,110,319.3
Lina Trade *	200,000.0
Linde	532,503.3
Meraki Group*	200,000.0
Metalcraft *	161,000.0
Mexichem Fluor DBA Koura	25,479,884.3

 $^{^{\}mbox{\tiny 1}}\,\mbox{A}$ comprehensive overview and discussion of allocation decisions to new market entrants can be found in the Agency's April 5, 2022, notice

TABLE 3—CONSUMPTION ALLOWANCES FOR CALENDAR YEAR 2023—Continued

Entity	Number of consumption allowances issued (MTEVe) 1
Mondy Global National Refrigerants Nature Gas Import and Export North American Refrigerants* O23 Energy Plus* Perfect Score Too DBA Perfect Cycle* Reclamation Technologies* Refrigerants, Inc. RMS of Georgia RTR Suppliers* Saalok* Sciarra Laboratories* SDS Refrigerant Services* Showa Chemicals of America Solvay Fluorides Summit Refrigerants* SynAglie Corporation* Technical Chemical TradeQuim* Transocean Offshore Deepwater Drilling Tulstar Products Tyco Fire Products* USA United Suppliers of America DBA USA Refrigerants* USSO Cacquisition Corp* Walmart Waysmos USA Weltron Wesco HMB* Wilhelmsen Ships Service	318,706.9 19,806.810.9 819,624.4 200,000.0 200,000.0 37,876.0 200,000.0 26,550.9 1,621,276.8 198,000.0 200,000.0 73,466.6 1,102,459.2 200,000.0 1,125.1 974,140.0 200,000.0 16.8 734,110.9 200,000.0 131,451.0 2,280,583.0 634,504.6 6,338,344.6 200,000.0 40,392.5
Total	273,498,315.0

¹ Numbers may not sum due to rounding.

On September 30, 2022, EPA also provided notice to four entities of the Agency's intent to take administrative consequences in accordance with 40 CFR 84.35. Using this authority, EPA can retire, revoke, or withhold the allocation of allowances, or ban a company from receiving, transferring, or conferring allowances.² EPA provided notice of its intent to retire an identified set of each of the four companies' allowances, affecting both calendar year 2022 and calendar year 2023 allowances.

Iudicial Review

The AIM Act provides that certain sections of the Clean Air Act (CAA) "shall apply to" the AIM Act and actions "promulgated by the Administrator of [EPA] pursuant to [the AIM Act] as though [the AIM Act] were

expressly included in title VI of [the CAA]." 42 U.S.C. 7675(k)(1)(C). Among the applicable sections of the CAA is section 307, which includes provisions on judicial review. Section 307(b)(1) provides, in part, that petitions for review must only be filed in the United States Court of Appeals for the District of Columbia Circuit: (i) when the agency action consists of "nationally applicable regulations promulgated, or final actions taken, by the Administrator," or (ii) when such action is locally or regionally applicable, but "such action is based on a determination of nationwide scope or effect and if in taking such action the Administrator finds and publishes that such action is based on such a determination." For locally or regionally applicable final actions, the CAA reserves to the EPA complete discretion whether to invoke the exception in (ii).

The final action herein noticed is "nationally applicable" within the meaning of CAA section 307(b)(1). The AIM Act imposes a national cap on the total number of allowances available for

each year for all entities nationwide. 42 U.S.C. 7675(e)(2)(B)–(D). For 2023, there was a national pool of 344,299,157 production allowances and 273,498,315 consumption allowances available to distribute. The action noticed herein distributed that finite set of allowances consistent with the methodology EPA established in the nationally applicable framework rule. As such, the allowance allocation is the division and assignment of a single, nationwide pool of HFC allowances to entities across the country according to the uniform, national methodology established in EPA's regulations. Each entity's allowance allocation is a relative share of that pool; thus, any additional allowances awarded to one entity directly affects the allocations to others.

In the alternative, to the extent a court finds the final action to be locally or regionally applicable, the Administrator is exercising the complete discretion afforded to him under the CAA to make and publish a finding that the action is based on a determination of

² See Table 1.

^{*}These entities were issued consumption allowances consistent with the provisions in 40 CFR 84.15(e)(3). Consistent with 40 CFR 84.15(e)(3) and as clarified in the Agency's 2021 final rule, these entities were issued the same number of allowances for 2023 as they were in 2022. In accordance with 40 CFR 84.15(f)(1), allowances allocated to these entities may not be transferred.

² Administrative consequences that the Agency has finalized can be found here: https:// www.epa.gov/climate-hfcs-reduction/ administrative-consequences-under-hfc-allocationrule.

"nationwide scope or effect" within the meaning of CAA section 307(b)(1).3 In deciding to invoke this exception, the Administrator has taken into account a number of policy considerations, including his judgment regarding the benefit of obtaining the D.C. Circuit's authoritative centralized review, rather than allowing development of the issue in other contexts, in order to ensure consistency in the Agency's approach to allocation of allowances in accordance with EPA's national regulations in 40 CFR part 84. The final action treats all affected entities consistently in how the Part 84 regulations are applied. The allowance allocation is the division and assignment of a single, nationwide pool of HFC allowances to entities across the country according to the uniform, national methodology established in EPA's regulations, and each entity's allowance allocation is a relative share of that pool; thus, any additional allowances awarded to one entity directly affect the allocations to others. The Administrator finds that this is a matter on which national uniformity is desirable to take advantage of the D.C. Circuit's administrative law expertise and facilitate the orderly development of the basic law under the AIM Act and EPA's implementing regulations. The Administrator also finds that consolidated review of the action in the D.C. Circuit will avoid piecemeal litigation in the regional circuits, further judicial economy, and eliminate the risk of inconsistent results for different regulated entities. The Administrator also finds that a nationally consistent approach to the allocation of allowances constitutes the best use of agency resources. The Administrator is publishing his finding that the action is based on a determination of nationwide scope or effect in the Federal Register as part of this notice in addition to inclusion on the website announcing allocations.

For these reasons, the final action of the Agency allocating hydrofluorocarbon allowances to entities located throughout the country is nationally applicable or, alternatively, the Administrator is exercising the complete discretion afforded to him by the CAA and finds that the final action is based on a determination of nationwide scope or effect for purposes of CAA section 307(b)(1) and is hereby

publishing that finding in the **Federal Register**.

Under section 307(b)(1) of the CAA, petitions for judicial review of this action must be filed in the United States Court of Appeals for the District of Columbia Circuit by December 12, 2022.

Hans Christopher Grundler,

Director, Office of Atmospheric Programs. [FR Doc. 2022–22059 Filed 10–7–22; 8:45 am] BILLING CODE 6560–50–P

FEDERAL COMMUNICATIONS COMMISSION

[OMB 3060-0863; FR ID 108097]

Information Collection Being Reviewed by the Federal Communications Commission

AGENCY: Federal Communications Commission.

ACTION: Notice and request for comments.

SUMMARY: As part of its continuing effort to reduce paperwork burdens, and as required by the Paperwork Reduction Act of 1995 (PRA), the Federal Communications Commission (FCC or Commission) invites the general public and other Federal agencies to take this opportunity to comment on the following information collection. Comments are requested concerning: whether the proposed collection of information is necessary for the proper performance of the functions of the Commission, including whether the information shall have practical utility; the accuracy of the Commission's burden estimate; ways to enhance the quality, utility, and clarity of the information collected; ways to minimize the burden of the collection of information on the respondents, including the use of automated collection techniques or other forms of information technology; and ways to further reduce the information collection burden on small business concerns with fewer than 25 employees. The FCC may not conduct or sponsor a collection of information unless it displays a currently valid Office of Management and Budget (OMB) control number. No person shall be subject to any penalty for failing to comply with a collection of information subject to the PRA that does not display a valid OMB control number.

DATES: Written PRA comments should be submitted on or before December 12, 2022. If you anticipate that you will be submitting comments but find it difficult to do so within the period of time allowed by this notice, you should

advise the contact listed below as soon as possible.

ADDRESSES: Direct all PRA comments to Cathy Williams, FCC, via email to *PRA@ fcc.gov* and to *Cathy.Williams@fcc.gov*.

FOR FURTHER INFORMATION CONTACT: For additional information about the information collection, contact Cathy Williams at (202) 418–2918.

SUPPLEMENTARY INFORMATION:

OMB Control Number: 3060–0863. Title: Satellite Delivery of Network Signals to Unserved Households for Purposes of the Satellite Home Viewer Act.

Form Number: Not applicable. Type of Review: Extension of a currently approved collection.

Respondents: Business or other forprofit entities.

Number of Respondents and Responses: 848 respondents; 250,000 responses.

Estimated Time per Response: 0.50 hours.

Frequency of Response: Recordkeeping requirement, On occasion reporting requirement.

Obligation to Respond: Required to obtain or retain benefits. Statutory authority for this information collection action is contained in 47 U.S.C. 339.

Total Annual Burden to Respondents: 125,000 hours.

Total Annual Cost: No cost.

Needs and Uses: The information collection requirements contained in 47 CFR 73.686 describes a method for measuring signal strength at a household so that the satellite and broadcast industries would have a uniform method for making an actual determination of the signal strength that a household received. The information gathered as part of the noise-limited service contour signal strength tests will be used to indicate whether a household is "unserved" by over-the-air network signals.

Satellite and broadcast industries making field strength measurements for formal submission to the Commission in rulemaking proceedings, or making such measurements upon the request of the Commission, shall follow the procedure for making and reporting such measurements which shall be included in a report to the Commission and submitted in affidavit form, in triplicate. The report shall contain the following information:

(a) Tables of field strength measurements, which for each measuring location; (b) U.S. Geological Survey topographic maps; (c) All information necessary to determine the pertinent characteristics of the transmitting installation; (d) A list of

³ In the report on the 1977 Amendments that revised section 307(b)(1) of the CAA, Congress noted that the Administrator's determination that the "nationwide scope or effect" exception applies would be appropriate for any action that has a scope or effect beyond a single judicial circuit. See H.R. Rep. No. 95–294 at 323, 324, reprinted in 1977 U.S.C.C.A.N. 1402–03.

LAWRENCE J. JOSEPH, ESQ.

1250 Connecticut, NW, Suite 700-1A – Washington, DC 20036 Tel: 202-355-9452 – Fax: 202-318-2254 www.larryjoseph.com

December 12, 2022

VIA EMAIL AND PRIORITY MAIL

Cynthia Newberg, Director Stratospheric Protection Division Office of Air & Radiation U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460 Email: Newberg.Cindy@epa.gov

Hans Christopher Grundler
Director, Office of Atmospheric Programs
Office of Air & Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Email: Grundler.Christopher@epa.gov

Re: HFC Allocations for Peter Williams

Dear Ms. Newberg and Mr. Grundler:

On behalf of Peter Williams, this letter follows on J. Gordon Arbuckle's letter to Ms. Newberg dated April 20, 2022, and Luke Hall-Jordan's email to Mr. Williams on April 26, 2022. Mr. Arbuckle's letter asked Ms. Newberg to reconsider the denial dated March 31, 2022 ("EPA Denial"), of Mr. Williams' application for hydrofluorocarbons ("HFC") allocations as a new entrant under 40 C.F.R. § 84.15(c)(2). Mr. Grundler signed the Federal Register notices for the 2022 new-entrant allocation, 87 Fed. Reg. 19,683 (Apr. 5, 2022), and for the 2023 and subsequent allocations, 87 Fed. Reg. 61,314 (Oct. 11, 2022). This letter advises you of Mr. Williams' understanding of the issues presented here and how EPA can and should resolve them.

FACTUAL BACKGROUND

Under EPA's program for HFC phasedown, Mr. Williams timely applied for a new entrant allocation of 200,000 metric tons of exchange value equivalent ("MTEVe") as "Peter Williams/dba The New Era Group." His application materials clearly describe the applicant as unincorporated in South Carolina.

Based on Georgia corporate information about "New Era Group, Inc." outside of Mr. Williams' application, EPA found the applicant to "share corporate or common ownership, corporate affiliation in the past five years, or familial relations' with an entity receiving allowances through this rule, specifically RMS of Georgia." EPA Denial, at 1. In addition, based on EPA's erroneous understanding that the applicant was "New Era Group, Inc." of Georgia,

EPA also found the application incomplete for omitting certain corporate information about New Era Group, Inc. "For these reasons, EPA is denying New Era Group's application." *Id.* at 2.

Mr. Arbuckle's letter explained that Mr. Williams was an individual operating under the "dba" New Era Group, not the Georgia corporation with a similar name. The letter included an affidavit from Mr. Williams, which explained his operation as "Peter Williams (d/b/a The New Era Group" since 2008, as well as his involvement with and dissociation from New Era Group, Inc. of Georgia. Mr. Williams participated in New Era Group, Inc. of Georgia with other industry stakeholders for purposes of filing comments with EPA and litigation. The corporation was "a nonprofit organization that represents the interests ofhydrochlorofluorocarbon-22 reclaimers and producers of alternative refrigerants." New Era Group, Inc.'s Certificate of Parties, Rulings Under Review, and Related Cases Pursuant to Circuit Rule 28(a)(l), at 1, New Era Grp., Inc. v. EPA, 2014 U.S. App. LEXIS 19027 (D.C. Cir. Oct. 3, 2014) (No. 14-1054).

The "Who Is" search for neweragroupinc.com shows that the domain was first registered in 2009.² According to the Georgia Secretary of State's website,³ the Georgia corporation "New Era Group, Inc." was incorporated on May 16, 2014, and administratively dissolved on October 22, 2020, after filing its last annual registration in 2019. (EPA located that 2019 registration, which was filed on March 29, 2019.)

In response to Mr. Arbuckle's letter, EPA staff contacted Mr. Williams to indicate that the 2022 allocation was final and could not be revised:

We've had a chance to confer on whether there are additional administrative processes within EPA to reconsider the decision to deny your request for set-aside allowances as a new market entrant. We were not able to identify any process by which you could appeal the decision to the Agency, as the decisions were final agency action and all allowances from the set-aside have been allocated.

Mr. Williams does not waive his arguments about that dissociation, but for the reasons set out in Section I.C, *infra*, EPA can find that Mr. Williams does not share "corporate affiliation" with RMS of Georgia without considering those arguments about dissociation.

https://www.godaddy.com/whois (last visited Dec. 12, 2022).

https://ecorp.sos.ga.gov/BusinessSearch (last visited Dec. 12, 2022).

Email from Luke Hall-Jordan, Environmental Protection Agency, to Peter Williams (April 26, 2022).

EPA allocated Altair Partners significant HFC allocations, both for 2022 and for 2023 and subsequent years. *See* 86 Fed. Reg. 55,841, 55,843 (Oct. 7, 2021) (allocating Altair 2,908,497.9 MTEVe for 2022); 87 Fed. Reg. at 19,686 (allocating Altair an additional 5,390.0 MTEVe for 2022); 87 Fed. Reg. at 61,316 (allocating Altair 2,918,730.4 MTEVe for 2023 and subsequent years). For 2022 and 2023, however, EPA retired 2,441,028.6 MTEVe and 2,449,616.4 MTEVe, respectively, as an administrative consequence of Altair's "[m]isreport[ing] data used for purposes of allocating allowances."

DISCUSSION

To proceed in this matter, EPA needs to determine whether the Agency erred in denying Mr. Williams' application and, if so, whether the Agency may correct that error prospectively for the HFC allocations for 2023 and subsequent years and retrospectively for the HFC allocations for 2022. The following two sections address those two questions.

I. EPA's denial of Mr. Williams' application was erroneous.

In denying Mr. Williams' application, EPA apparently noticed that Mr. Williams' "dba" or trade name—New Era Group—was similar to the name of a Georgia corporation, New Era Group, Inc., with which Mr. Williams had been involved. Based on connections between an existing HFC importer—RMS of Georgia—EPA concluded that "New Era Group" (*i.e.*, Mr. Williams) was ineligible for HFC allocations as a new market entrant. EPA's conclusion was erroneous on several levels. *First*, the trade name "New Era Group" was not the corporation New Era Group, Inc. of Georgia. *Second*, an induvial like Mr. Williams cannot do business as a corporation. *Third*, and in any event, Mr. Williams past involvement with New Era Group, Inc. of Georgia does not tie him to RMS of Georgia under 40 C.F.R. § 84.15(c)(2).

A. <u>EPA erroneously conflated Mr. Williams' trade name with a separate</u> corporation.

Since 2008, Mr. Williams has done business as "New Era Group" in South Carolina. Notwithstanding the similarity of the two names, Mr. Williams' application clearly indicates that

⁴ See Administrative Consequences Under the HFC Allocation Rule (Dec. 8, 2022), https://www.epa.gov/climate-hfcs-reduction/administrative-consequences-under-hfc-allocation-rule (last visited Dec. 12, 2022).

the applicant is unincorporated. The HFC regulations clearly recognize that individuals are not corporations. 40 C.F.R. § 84.3 (defining "person" to include not only individuals but also corporations). EPA thus erred in assuming that Mr. Williams was applying as New Era Group, Inc. of Georgia.

B. EPA erroneously conflated Mr. Williams with a corporation.

Even without EPA's mistaken belief that Mr. Williams' "dba" or trade name referred to the Georgia corporation named "New Era Group, Inc.," EPA's conflation of Mr. Williams with a corporation erred on a more basic level. With exceptions not relevant here,⁵ an individual cannot "do business as" a corporation.

Indeed, even if Mr. Williams owned New Era Group, Inc. of Georgia—which he never did—his use of "New Era Group" as a "dba" or trade name would not equate the corporation with the trade name: "An individual doing business under a trade name is clearly a sole proprietor distinct under Georgia law from a corporation in which that individual holds stock." *Miller v. Harco Nat'l Ins. Co.*, 274 Ga. 387, 390, 552 S.E.2d 848 (2001); *see also BellSouth Corp. v. FCC*, 162 F.3d 678, 684 (D.C. Cir. 1998) ("it is obvious that there are differences between a corporation and an individual under the law"). Moreover, "[c]orporations are creatures of state law," *Cort v. Ash*, 422 U.S. 66, 84 (1975); *Business Roundtable v. SEC*, 905 F.2d 406, 412 (D.C. Cir. 1990); *Doe v. McMaster*, 355 S.C. 306, 313, 585 S.E.2d 773, 777 (2003); *Tr. Co. of Ga. v. State*, 109 Ga. 736, 755, 35 S.E. 323, 329-30 (1900), and no relevant provision of law equates individuals with corporations.

Both before and after the existence of New Era Group, Inc. of Georgia, Mr. Williams did business under the trade name "New Era Group." That cannot make Mr. Williams a corporation, and it does not make him "New Era Group, Inc." of Georgia.

C. EPA erroneously applied § 84.15(c)(2) to Mr. Williams.

In pertinent part, § 84.15(c)(2) limits new-entrant allocations to "[p]ersons who ... do not

The exception proves the rule. It is possible for an individual to be a corporation *de facto* even if the individual is not a corporation *de jure*, *Tulare Irrigation Dist. v. Shepard*, 185 U.S. 1, 13-14 (1902), but that requires specific findings (*e.g.*, an attempt to incorporate under an applicable state corporation law and actual use of the corporate franchise), *id.*, none of which were met here. All that Mr. Williams did here was use an email address that included "inc" in it, based on his plans to incorporate some day in the future. That does not make Mr. Williams a corporation *de facto*.

share corporate or common ownership, corporate affiliation in the past five years, or familial relations with entities receiving allowances through this rule." 40 C.F.R. § 84.15(c)(2). EPA cited this provision to deny Mr. Williams' application, based on the perceived relationship between New Era Group, Inc. of Georgia and RMS of Georgia. Given EPA's conflation of Mr. Williams and New Era Group, Inc. of Georgia, EPA also found the application incomplete in that it did not provide certain information related to New Era Group, Inc. of Georgia.

1. Mr. Williams did not share "corporate or common ownership" with RMS of Georgia.

The first potentially pertinent clause of § 84.15(c)(2) withholds new-entrant status for sharing "corporate or common ownership" with an entity already receiving HFC allocations. There is no suggestion in the Georgia corporate materials that EPA located to suggest that either Mr. Williams or his trade name—New Era Group of South Carolina—owns any part either of New Era Group, Inc. of Georgia or of RMS of Georgia.

2. Mr. Williams did not share "corporate affiliation" with RMS of Georgia.

The second potentially pertinent clause of § 84.15(c)(2) withholds new-entrant status for sharing "corporate affiliation" with an entity already receiving HFC allocations. Given the clear inapplicability of the first and third clauses, this presumably is what EPA found to apply.

As Mr. Williams has explained by affidavit, he timely dissociated himself from New Era Group, Inc. of Georgia, but even without that, the second clause would not apply because New Era Group, Inc. of Georgia was not itself an "entit[y] receiving allowances through this rule." 40 C.F.R. § 84.15(c)(2). Having a consultant like Mr. Williams and principals from industry stakeholders like RMS of Georgia participate in the same nonprofit does not make the consultants or the nonprofit itself an "entit[y] receiving allowances through this rule" for purposes of § 84.15(c)(2). It may well be that the relationship between New Era Group, Inc. of Georgia and RMS of Georgia would preclude New Era Group, Inc. of Georgia from receiving a new-entrant allocation, but that is irrelevant to whether Mr. Williams or his trade name—New Era Group of South Carolina—shared a "corporate affiliation" with RMS of Georgia.

In mathematical terms, § 84.15(c)(2)'s "corporate affiliation" prong is not transitive. The twin facts that (a) Mr. Williams may have had a "corporate affiliation" with New Era Group, Inc., and (b) New Era Group, Inc., may have had a "corporate affiliation" with RMS of Georgia, does not mean that Mr. Williams has a "corporate affiliation" with RMS of Georgia. To the contrary, the "corporate affiliation" must be with the "entit[y] receiving allowances through this rule." 40 C.F.R. § 84.15(c)(2). New Era Group, Inc. cannot bridge the gap between Mr. Williams

and RMS of Georgia because New Era Group, Inc. itself is not an "entit[y] receiving allowances through this rule." 40 C.F.R. § 84.15(c)(2).

3. Mr. Williams did not share "familial relations" with RMS of Georgia.

The third and last potentially pertinent clause of § 84.15(c)(2) withholds new-entrant status for sharing "familial relations" with an entity already receiving HFC allocations. There is no suggestion in the non-record materials that EPA located to suggest a familial relationship with RMS of Georgia.

4. <u>EPA's incompleteness finding on Mr. Williams' application was derivative of EPA's erroneous corporate analysis.</u>

If Mr. Williams' trade name—New Era Group of South Carolina—is not the same person as New Era Group, Inc. of Georgia, then not including information about relationships between that third-party and RMS of Georgia does not make Mr. Williams' application incomplete. Quite simply, New Era Group, Inc. of Georgia and RMS of Georgia have nothing to do with Mr. Williams' application.

II. EPA staff erroneously concluded that nothing can be done.

If EPA erred in conflating (a) Mr. Williams and his trade name with (b) New Era Group, Inc. of Georgia and RMS of Georgia, EPA still could correct its error, both with respect to the initial 2022 allocation and with respect to the more recent allocation for 2023 and subsequent years. This is basic administrative law: "An initial agency interpretation is not instantly carved in stone." *Chevron, U.S.A., Inc. v. NRDC, Inc.*, 467 U.S. 837, 863-64 (1984). Indeed, if the Clean Air Act did not allow reconsideration, that would raise questions of whether the HFC allocation program is even constitutional.

A. The Clean Air Act, administrative law, and Constitution provide a path to remedy EPA's errors on Mr. Williams' application.

Section 307(b)(1) of the Clean Air Act expressly contemplates administrative petitions for reconsideration. *See* 42 U.S.C. § 7607(b)(1).⁶ It is doubtful that the First Amendment would allow a statute that barred the affected public from petitioning an agency to correct an error.

Add. 40a

To be sure, § 307(b)(1) also limits the effect of a petition for reconsideration on actions' finality for judicial review and on the date when actions take effect. *See id.*

The Supreme Court recently recognized administrative petitions for reconsideration as the administrative-law norm:

Congress has carried the model of principal officer review into the modern administrative state. As the Government forthrightly acknowledged at oral argument, it certainly is the norm for principal officers to have the capacity to review decisions made by inferior adjudicative officers. The Administrative Procedure Act, from its inception, authorized agency heads to review such decisions. And "higher-level agency reconsideration" by the agency head is the standard way to maintain political accountability and effective oversight for adjudication that takes place outside the confines of §557(b). To take one example recently discussed by this Court in Free Enterprise Fund, the Public Company Accounting Oversight Board can issue sanctions in disciplinary proceedings, but such sanctions are reviewable by its superior, the Securities and Exchange Commission.

United States v. Arthrex, Inc., 141 S.Ct. 1970, 1983-84 (2021) (interior quotation marks and citations omitted). In short, whatever the implications for judicial review of EPA's deciding not to correct its error, the Clean Air Act not only allows Mr. Williams to petition EPA to correct its error, but also allows EPA to grant that petition.

B. <u>EPA's distribution of 2022 HFC allocations in April of 2022 does not preclude EPA's remedying its errors on Mr. Williams' application now.</u>

If EPA acknowledges its mistake in denying Mr. Williams' application and the existence of an administrative avenue to remedy that mistake, Mr. Hall-Jordan's remaining concern (*i.e.*, that "all allowances from the set-aside have been allocated") poses no obstacle now, even if it posed an obstacle on April 26, 2022. The administrative consequences assessed against Altair Partners provide ample allowances for 2022 and 2023 to make Mr. Williams whole.

C. <u>If EPA and its Administrator cannot remedy EPA's errors on Mr. Williams'</u> application, the entire HFC program violates the Appointments Clause.

As indicated, § 307(b)(1)'s plain language about reconsideration, the Supreme Court's recognition of that norm in *Arthrex*, and the First Amendment's petition clause all support Mr. Williams' ability to petition EPA for reconsideration of its erroneous denial of his application. If, notwithstanding those sources, your staff are correct that Mr. Williams cannot petition EPA to reconsider the final agency actions of Ms. Newberg's denying Mr. Williams' application and Mr.

Grundler's promulgating the allocation notices, the HFC allocation process would violate the Constitution's Appointments Clause. U.S. CONST. art. II, § 2, cl. 2.

Under that Clause, principal officers must be appointed by the President with the advice and consent of the Senate, while inferior officers may be appointed by the President alone, the head of an executive department, or a court. *Id.* To the extent that you exercise significant governmental authority, *Buckley v. Valeo*, 424 U.S. 1, 126 & n.162 (1976), you qualify as at least inferior officers. *See Edmond v. United States*, 520 U.S. 651, 660-62 (1997). Under *Arthrex*, however, "[o]nly an officer properly appointed to a principal office may issue a final decision binding the Executive Branch" in such proceedings. *Arthrex*, 141 S.Ct. at 1985. The Clause is simply another reason you should accept Mr. Williams' argument in Section II.A, *supra*, that EPA can correct its error here, notwithstanding Mr. Hall-Jordan's analysis.

D. EPA should remedy its HFC actions' disparate race-based impacts.

Finally, as the record reflects and I believe you know, Mr. Williams is a person of color and—on information and belief—the only person of color who applied for HFC allocations. EPA's implementing regulations prohibit disparate impacts based on race. 40 C.F.R. § 7.35(b). While disparate impacts alone may not be actionable, *see*, *e.g.*, *Alexander v. Sandoval*, 532 U.S. 275, 288-89 (2001), an agency's failure to follow its own regulations is actionable. *United States v. Macdaniel*, 32 U.S. (7 Pet.) 1, 15 (1833); *Morton v. Ruiz*, 415 U.S. 199, 235 (1974). As relevant here, Mr. Williams is also—on information and belief—the only person whose application EPA erroneously denied.

As galling as that is by itself, it is all the worse when EPA's treatment of Altair Partners is factored into the equation:

- Mr. Williams—who did nothing wrong—is punished permanently for EPA's mistake.
- Altair—whose misreporting appears to have garnered an initial 2022 allocation of 2,908,497.9 MTEVe—was docked 83% as an administrative consequence for 2022 and 2023, but otherwise credited thereafter with its inflated allocation. *Compare* 86 Fed. Reg. at 55,843 (2022) *with* 87 Fed. Reg. at 61,316 (2023 and subsequent years).

In other words, the person of color pays for all years for EPA's mistake, while a limited partnership benefits prospectively—after two one-year penalties—for its own misreporting.

In equal-protection contexts, "the appropriate remedy is a mandate of *equal* treatment, [which] can be accomplished by withdrawal of benefits from the favored class as well as by extension of benefits to the excluded class." *Heckler v. Mathews*, 465 U.S. 728, 740 (1984)

(emphasis in original). Either Mr. Williams should be allowed to cure EPA's mistake—at least prospectively for 2023 and subsequent years—or Altair should not be allowed to avoid its mistake with mere one-year penalties. EPA must either level Mr. Williams up or level Altair down.

REQUESTED RELIEF

Mr. Williams respectfully submits that the Agency has not only the power to correct the injustice done here, but also the obligation to do so. Specifically, EPA should provide Mr. Williams the 2022 allocation that EPA wrongly denied from the materials that EPA reclaimed under administrative consequences and should extend that allocation for 2023 and subsequent years.

Mr. Williams intends to pursue any available legal options if this issue cannot be resolved administratively, including petitioning for review of the HFC allocation for 2023 and subsequent years, 87 Fed. Reg. 61,314 (Oct. 11, 2022). Please include this letter in the administrative record of that action, for which EPA did not seek comment.

CONCLUSION

Please advise me whom among the two of you, your respective staffs, or counsel I should follow up to discuss these issues.

Yours sincerely,

/s/ Lawrence J. Joseph

Lawrence J. Joseph

cc: Jeffrey M. Prieto, Esq. EPA General Counsel (via email, w/Encl.)

RMS of Georgia, LLC

610 McFarland 400 Dr. Alpharetta, GA 30004 770-777-0597 770-777-0599 Fax www.rmsgas.com





D.O.T. & E.P.A. Certified Center

December 29, 2022

BY FEDEX AND ELECTRONIC MAIL

Cynthia A. Newberg, Director U.S. Environmental Protection Agency Stratospheric Protection Division 1200 Pennsylvania Avenue, NW Washington, D.C. 20460 HFCAllocation@epa.gov

Re: EPA March 31, 2022 AIM Act Affiliation Determination Impacting RMS of Georgia

Dear EPA:

RMS of Georgia, LLC d/b/a Choice Refrigerants ("*RMS*") requests that EPA correct its mistaken regulatory determination, which EPA announced in an unpublished March 31, 2022 letter (Attachment A, hereto), purporting to find that "Peter Williams DBA New Era Group" or his business(es) (referred to herein as "Williams") are affiliated with RMS for purposes of the AIM Act. We note that EPA made this regulatory determination without ever communicating with or notifying RMS, which raises serious good government and due process concerns. RMS found out about this determination only after seeing a petition filed by Williams in the federal appeals court.

As background, after we learned of EPA's action, our legal counsel left a voice message with Luke Hall-Jordan on December 14, 2022, detailing our concern that EPA had incorrectly determined that Williams is a corporate affiliate of RMS and asking EPA to correct the determination that Williams was affiliated with RMS. Our legal counsel subsequently emailed EPA on December 16, 2022, requesting a meeting to discuss EPA's action. Sadly, EPA refused to meet with us or to discuss this situation in good faith. Subsequently, in a December 27, 2022 telephone call with our legal counsel, your lawyer (Sarah Buckley) stated that EPA did not understand from our legal counsel's voice message and follow-up email that RMS wanted EPA to correct its determination that Williams was affiliated with RMS. We find that explanation implausible given the circumstances. Nonetheless, please consider this letter as RMS's formal request that EPA rescind and correct the agency's March 31, 2022 determination to the extent of any finding that Williams and RMS are affiliated.

EPA's March 31, 2022 determination letter (which, as noted, was never provided to RMS) asserts in relevant part that:

Public data available to the Agency from the State of Georgia Secretary of State confirms that you [Williams] and the owner of a company who received allowances under the final HFC Allocation Framework Rule [RMS] are both listed as officers for "New Era Group Inc" as recently as 2019. **This equates to corporate affiliation** in the past five years with an entity receiving allowances through this rule, and therefore disqualifies New Era Group's application in accordance with EPA's regulations. (Emphasis added.)

Choice Refrigerants – 2022 AIM Act Affiliation Determination Impacting RMS of Georgia December 29, 2022 Page 2

Based on this passage, we suspect that the agency may be equating "Peter Williams DBA New Era Group", which the agency mentions in the first sentence of its letter, with New Era Group, Inc., which is a Georgia non-profit corporation separate from any business of Williams. If this is the case, then EPA's determination is mistaken factually and legally. It is black letter law that an individual natural person doing business under a trade name, such as "Peter Williams DBA New Era Group", would be categorized as a sole proprietorship, and is not the same legal entity as New Era Group, Inc. In contrast, New Era Group, Inc. is a Georgia nonprofit corporation and under Georgia corporate law is a separate entity formed under the auspices of Georgia's nonprofit corporation law and recognized by the Georgia Secretary of State as such. Thus, if EPA is failing to make a distinction between (1) Peter Williams DBA New Era Group, on the one hand, and (2) New Era Group, Inc., on the other, then that is sufficient reason for EPA to correct its mistaken determination by rescinding its March 31 letter.

If, however, the agency is correctly considering Williams DBA New Era Group, New Era Group, Inc., and RMS as separate legal entities, but the agency is taking the position (as suggested by the passage from EPA's March 31 letter quoted above) that separate businesses (*i.e.*, Williams and RMS) can have a "corporate affiliation" based solely on their respective officers serving on the board of directors of a third-party nonprofit corporation trade association (*i.e.*, New Era Group, Inc.), then EPA is mistaken. Businesses do not become affiliated by participating in trade associations, particularly where the trade association is not itself a market participant.

In any regulatory determination, it is incumbent on the agency to articulate the legal basis for its action, yet EPA's March 31 letter cites no legal authority or precedent under the AIM Act or corporate law principles to support its findings and conclusions with respect to its finding that RMS has a corporate affiliation with either Williams or New Era Group, Inc. To the contrary, EPA's position is unsupportable by applicable law. As noted, Williams is apparently an individual operating as a sole proprietorship, whereas RMS is a Georgia limited liability company owned by Ken Ponder. Williams' business (whatever it may be) is separate and distinct from RMS – there is no business relationship between Williams and RMS; neither entity has any corporate, ownership, economic or other interest in the other entity, and there is no legal relationship between Williams and RMS under Georgia corporate law. Similarly, New Era Group, Inc., is a Georgia domestic nonprofit corporation that has no ownership, business or corporate affiliation with RMS under Georgia law. As is typical for trade associations, New Era Group, Inc.'s members served as directors of the nonprofit entity. In this case, Mr. Williams and executives of RMS served as directors and officers of New Era Group, Inc., until its dissolution; however, at no time did New Era Group, Inc., have any commercial relationship with its members, directors or officers. Nor in fact did New Era Group, Inc., have any import, sales or transactional business in the refrigerant market, and indeed EPA's letter does not assert that New Era Group, Inc., is a market participant under the AIM Act.¹

Under black-letter corporate law, a business is not affiliated with another business merely because the two businesses are associated with or participate in the same trade association. Nor is a business entity "affiliated" with a trade association by virtue of its executives serving as officers or directors of the trade association. It is also black letter law that nonprofit corporations, such as trade associations, do not have stockholders, owners, or controlling interests, and thus a trade association and its members (or officers) are not grouped as corporate affiliates for tax or liability purposes. Indeed, nonprofit

¹ Although not relevant to the legal analysis, New Era Group, Inc., was formed as a trade association in 2014 and was dissolved in 2020 (Attachment B, hereto). Although New Era Group, Inc., was formed to advocate for refrigerant reclaiming policy, in actuality it did not generate sufficient interest within the reclaim community and was never very active.

Choice Refrigerants – 2022 AIM Act Affiliation Determination Impacting RMS of Georgia December 29, 2022 Page 3

corporations are not even considered business entities under Georgia law. *See*, *e.g.*, Ga. Code § 14-11-101(2) ("Business entity" means "a limited liability company, a foreign limited liability company, a limited partnership, a foreign limited partnership, a general partnership, a corporation, or a foreign corporation."); Ga. Code § 14-3-140(3) ("Business corporation" means "a corporation for profit, incorporated under the provisions of Chapter 2 of this title."). Tellingly, EPA's March 31 letter cites no legal authority to the contrary.

EPA's AIM Act regulations do not define "corporate affiliation" as that term is used in the set-aside regulations that EPA cites in its March 31 letter, but there is no indication in the AIM Act allowance framework rule that EPA is creating special rules for affiliation that are inconsistent with customary corporate law principles. See § 84.15(c)(2) ("Set-aside of application-specific allowances, production allowances, and consumption allowances... Consumption allowances in paragraph (a) of this section are available to either: ... Persons who are newly importing regulated substances, do not share corporate or common ownership, corporate affiliation in the past five years, or familial relations with entities receiving allowances through this rule."). The ordinary meaning of corporate affiliate is that two business entities are related through ownership and control. See, e.g., Black's Law Dictionary (6th ed. 1991) ("Affiliate company" means a company "effectively controlled by another company" or "a branch, division or subsidiary"); Investment Company Act, 15 U.S.C. § 80a-2 (affiliate is a company in which there is ownership (direct or indirect) of 5 percent or more of the voting stock). EPA's March 31 letter does not identify any ownership or control relationship between Williams and RMS, and indeed there is none, that would support finding a corporate affiliate relationship.²

EPA's misapplication of the law in this situation is akin to saying that two otherwise independent businessmen who are on the same church board of elders are somehow business partners. There is simply no basis in corporate law or the AIM Act for EPA's unfounded assumption. We have repeatedly asked EPA's legal counsel to identify the legal basis for EPA's apparent position, and they have dissembled and failed to articulate any good faith legal basis for such a position. EPA's inability or refusal to provide a legal justification for its determination is troubling.

Moreover, it does not seem that EPA has applied this same approach uniformly to all nonprofit trade associations in the refrigerant sector, such as the Alliance, HARDI, AHRI, and other large trade associations. Indeed, doing so would upend the established legal regime upon which all of Washington, D.C. trade associations are dependent and would essentially make all market participants corporate affiliates of each other. For example, the Alliance for Responsible Atmospheric Policy Inc., which is a leading trade association in the refrigerant market, is a Virginia nonprofit corporation and has as its members many of the companies receiving AIM Act allowances (including Honeywell and Chemours) and its officers have included personnel from Rheem, Daiken (an allowance holder), Trane, Lennox, and Carrier, among others (Attachment C, hereto). Thus, if EPA were applying its putative approach uniformly, all these entities would be considered affiliated for AIM Act purposes. Although EPA makes corporate affiliate determinations without transparency, we doubt that EPA has applied the same approach for these companies and we doubt whether the agency has undertaken an analysis of whether other market participants would be "affiliated" under EPA's questionable interpretation.

² If EPA is adopting a definition of corporate affiliation that is more expansive than its ordinary meaning and usage, then EPA has in effect illegally adopted a new substantive rule without notice-and-comment rulemaking under the AIM Act (and Clean Air Act provisions incorporated by reference).

Choice Refrigerants – 2022 AIM Act Affiliation Determination Impacting RMS of Georgia December 29, 2022 Page 4

In sum, EPA's determination that Williams and RMS are corporate affiliates is without factual or legal basis. We therefore request that EPA issue a clarification in writing revoking that aspect of its March 31, 2022 letter within 10 days of receiving this request.

Sincerely,

Kenneth Ponder

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President

Attachments

ATTACHMENT A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

March 31, 2022

OFFICE OF AIR AND RADIATION

Mr. Peter Williams New Era Group 709 Pickering Drive Unit B Murrells Inlet, South Carolina 29567

Dear Mr. Peter Williams,

This letter communicates EPA's decision regarding Peter Williams DBA New Era Group (New Era Group)'s application for set-aside allowances under 40 CFR § 84.15(c). In accordance with the methodology finalized in the final Hydrofluorocarbon (HFC) Allowance Allocation and Trading Framework Rule (HFC Allocation Framework Rule), EPA issued allowances on October 1, 2021, to companies that had provided data on their historic import and production of HFCs, as well as entities that use HFCs in six applications specified by Congress. EPA also established the set-aside pool of allowances for a limited set of end users and importers (see 86 FR 55116). The set-aside pool of allowances was established for three groups: end users that qualify for application-specific allowances; existing importers that were not required to report under 40 CFR part 98 (i.e., the Greenhouse Gas Reporting Program); and new market entrants. New Era Group submitted an application for set-aside allowances as a new market entrant. The regulatory language specifies that set-aside allowances are available for entities "who are newly importing regulated substances, do not share corporate or common ownership, corporate affiliation in the past five years, or familial relations with entities receiving allowances through this rule." 40 CFR § 84.15(c)(2). EPA also explained in the final rule that new market entrants may include companies that had previously imported HFCs in any prior year but exited the business by 2020 and who did not otherwise qualify to receive general pool allowances (see 86 FR 55157).

After reviewing New Era Group's set-aside application and supporting information available to the Agency, EPA has determined that New Era Group is not eligible for allowances under the set-aside pool as a new market entrant and is therefore denying New Era Group's application. Based on the information before the Agency, EPA has determined that New Era Group does "share corporate or common ownership, corporate affiliation in the past five years, or familial relations" with an entity receiving allowances through this rule, specifically RMS of Georgia. Public data available to the Agency from the State of Georgia Secretary of State confirms that you and the owner of a company who received allowances under the final HFC Allocation Framework Rule are both listed as officers for "New Era Group Inc" as recently as 2019. This equates to corporate affiliation in the past five years with an entity receiving allowances through this rule, and therefore disqualifies New Era Group's application in accordance with EPA's regulations.

Further, the application submitted for new market entrant set-aside allowances was incomplete. EPA regulations at 40 CFR § 84.15(d)(2) require applicants "to be eligible for consideration" to provide "the complete ownership of the company (with percentages of ownership)" 40 CFR § 84.15(d)(2)(i). After Agency outreach explaining the relevant requirements, information submitted by the applicant failed to show the complete ownership of the company (with percentages of ownership). New Era Group also failed to provide as part of its application, "The date of incorporation and State in which the company is incorporated" 40 CFR § 84.15(d)(2)(iv), and the "State license identifier" 40 CFR § 84.15(d)(2)(v). For these reasons, EPA is denying New Era Group's application.

As of January 1, 2022, if New Era Group chooses to import any of the HFCs listed at 40 CFR Part 84 Appendix A, or blends containing any of those HFCs, the company will need to acquire allowances from another allowance holder by the time of import.

If you have questions about the content of this letter, please contact us at HFCAllocation@epa.gov. More information about the regulatory requirements, including fact sheets, frequently asked questions, and a list of existing allowance holders is available at https://www.epa.gov/climate-hfcs-reduction.

Sincerely,

Cynthia A. Newberg

Director, Stratospheric Protection Division

ATTACHMENT B

12/13/22, 1:24 PM **GEORGIA**



GEORGIA SECRETARY OF STATE

BRAD RAFFENSPERGER

HOME (/)

BUSINESS SEARCH

BUSINESS INFORMATION

Control Number: 14048832 Business Name: New ERA Group Inc

Domestic Nonprofit Business Status: Admin. Dissolved

Business Type: Corporation

Business Purpose: **NONE**

610 McFarland 400

Date of Formation / 5/16/2014 Principal Office Address: Drive, Alpharetta, GA, Registration Date:

30004, USA

Last Annual Registration State of Formation: Georgia

Year:

Dissolved Date: 10/22/2020

REGISTERED AGENT INFORMATION

Registered Agent Name: Robert Slaughter

Physical Address: 5975-C Parkway North Blvd, Cumming, GA, 30040, USA

County: Forsyth

OFFICER INFORMATION

Back

Name	Title	Business Address
Peter Vincent Williams	CEO	17 Grey Moss Road, Murrells Inlet, SC, 29576, USA
Lee Ponder	Secretary	610 McFarland 400 Drive, Alpharetta, GA, 30004, USA
Kenneth M Ponder	CFO	105 Laurel Lane, Cumming, GA, 30040, USA

Filing History Name History

Return to Business Search

Office of the Georgia Secretary of State Attn: 2 MLK, Jr. Dr. Suite 313, Floyd West Tower Atlanta, GA 30334-1530, Phone: (404) 656-2817 Toll-free: (844) 753-7825, WEBSITE: https://sos.ga.gov/

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Report a Problem?

12/13/22, 1:30 PM GEORGIA



GEORGIA SECRETARY OF STATE

BRAD RAFFENSPERGER

HOME (/)

BUSINESS SEARCH

BUSINESS INFORMATION

Business Name: New ERA Group Inc Control Number: 14048832

FILING HISTORY

Filing Number	Filing Date Time	Effective Date	Filing Type
01849168	5/19/2014 9:30:47 AM		Business Formation (/businesssearch/DownloadFile? filingNo=1849168)
10661746	9/22/2014 4:32:55 PM		Annual Registration (2014) (/businesssearch/DownloadFile? filingNo=10661746)
11037520	3/26/2015 3:34:48 PM		Annual Registration (2015) (/businesssearch/DownloadFile? filingNo=11037520)
12845600	2/29/2016 3:31:40 PM	2/29/2016	Annual Registration (2016) (/businesssearch/DownloadFile? filingNo=12845600)
14609448	6/15/2017 12:00:00 AM	6/15/2017	Notice of Admin. Dissolution/Revocation (/businesssearch/DownloadFile?filingNo=14609448)
14790898	8/7/2017 2:43:00 PM	8/7/2017	Annual Registration (2017) (/businesssearch/DownloadFile? filingNo=14790898)
15320362	2/13/2018 11:28:31 AM	2/13/2018	Annual Registration (2018) (/businesssearch/DownloadFile? filingNo=15320362)
17052913	3/29/2019 4:39:05 PM	3/29/2019	Annual Registration (2019) (/businesssearch/DownloadFile? filingNo=17052913)
19396207	8/7/2020 12:00:00 AM	8/7/2020	Notice of Admin. Dissolution/Revocation (/businesssearch/DownloadFile?filingNo=19396207)
19703471	10/22/2020 12:00:00 AM	10/22/2020	Administrative Dissolution (/businesssearch/DownloadFile? filingNo=19703471)

Page 1 of 1, records 1 to 10 of 10

Back

Office of the Georgia Secretary of State Attn: 2 MLK, Jr. Dr. Suite 313, Floyd West Tower Atlanta, GA 30334-1530, Phone: (404) 656-2817 Toll-free: (844) 753-7825, WEBSITE: https://sos.ga.gov/© 2015 PCC Technology Group. All Rights Reserved. Version 6.2.19 Report a Problem?

Control No.: 14048832

STATE OF GEORGIA

Secretary of State

Corporations Division 313 West Tower #2 Martin Luther King, Jr. Dr. Atlanta, Georgia 30334-1530

CERTIFICATE OF INCORPORATION

I, **Brian P. Kemp,** The Secretary of State and the Corporation Commissioner of the State of Georgia, hereby certify under the seal of my office that

New ERA Group Inc

a Domestic Non-Profit Corporation

is hereby issued a CERTIFICATE OF INCORPORATION under the laws of the State of Georgia on **May 16, 2014** by the filing of all documents in the Office of the Secretary of State and by the paying of all fees as provided by Title 14 of the Official Code of Georgia Annotated.

WITNESS my hand and official seal in the City of Atlanta and the State of Georgia on May 19, 2014



Brian P. Kemp Secretary of State

Tracking #: 53Xrvjmm

Date Filed:5/19/2014 9:30:47 AM

Articles of Incorporation

The Name of the Corporation:

New ERA Group Inc

The corporation is organized pursuant to the Georgia Nonprofit Corporation Code.

The Principal Place of Business:

610 McFarland 400 Drive Alpharetta, Georgia 30004

Registered Agent's Name and Address:

Lynn G Morgan CPA 5975-C Parkway North Blvd Cumming, Georgia 30040, Forsyth County

Effective Date: May 16, 2014

Optional Provisions:

Incorporator(s):

Peter Vincent Williams
17 Grey Moss Road
Murrells Inlet, South Carolina 29576
Kenneth M Ponder
105 Laurel Lane
Cumming, Georgia 30040

The Corporation will not have members.

A person who signs a document submits an electronic filing he or she knows is false in any material respect with the intent that the document be delivered to the Secretary of State for filing shall be guilty of a misdemeanor and, upon conviction thereof, shall be punished to the highest degree permissible by law. [O.C.G.A. § 14-2-129.]

IN WITNESS WHEREOF, the undersigned has executed these Articles of Incorporation on the date set forth below:

Signed by: Peter Vincent Williams Attorney-in-Fact

Date: May 19, 2014



STATE OF GEORGIA 2014 Corporation Annual Registration

Secretary of State Control No.: 14048832

Date Filed:9/22/2014 4:32:55 PM

OFFICE OF THE SECRETARY OF STATE

Annual Registration Filing P.O. Box 23038 Columbus, Georgia 31902-3038

Information on record as of: 4:32:56 PM

Entity Control No. 16888405 Amount Due: \$30.00 Amount Due AFTER June 1, 2014: \$30.00

New ERA Group Inc 610 McFarland 400 Drive Alpharetta, Georgia 30004

Each business entity registered or filed with the Office of Secretary of State is required to file an annual registration. Amount due for this entity is indicated above and below on the remittance form. Annual fee is \$30. If amount is more than \$30, the total reflects amount(s) due from previous year(s) and any applicable late fee(s). Renew by April 1,2013 Your Annual Registration must be postmarked by June 1,2014. If your registration and payment are not postmarked by June 1,2014, you will be assessed a \$25.00 late filing penalty fee.

For faster processing, we invite you to file your Annual Registration online with a credit card at http://www.sos.ga.gov/corporations/ The Corporations Division accepts Visa, MC, Discover, American Express and ATM/Debit Cards with the Visa or MC logo for online filings only. Annual Registrations not processed online require payment with a check, certified bank check or money order. We cannot accept cash for payment.

You may mail your registration in by submitting the bottom portion of this remittance with a check or money order payable to "Secretary of S t a t e". All checks must be preprinted with a complete address in order to be accepted by our offices for your filing. Absolutely, no counter or starter checks will be accepted. Failure to adhere to these guidelines will delay or possibly reject your filing. Checks that are dishonored by your bank are subject to a \$30.00 NSF charge. Failure to honor your payment could result in a civil suit filed against you and/or your entity may be Administratively Dissolved by the Secretary of State. [See O.C.G.A. § 13-6-15 and Title 14, respectively.]

Officer, address and Agent information currently of record is listed below. Please verify "county of registered office." If correct and complete, detach bottom portion, sign, and return with payment. Or, enter changes as needed and submit. Complete each line, even if the same individual serves as Chief Executive Officer, Chief Financial Officer, and Secretary of the corporation.

Note: Registered Agent address must be a street address in Georgia where the agent may be served personally. A mail drop or P.O. Box does not comply with Georgia law for registered office. P.O. Boxes may be used for principal office and officers'addresses.

Any person authorized by the entity to do so may sign and file registration (including online filing). Additionally, a person who signs a document submits an electronic filing he or she knows is false in any material respect with the intent that the document be delivered to the Secretary of State for filing shall be guilty of a misdemeanor and, upon conviction thereof, shall be punished to the highest degree permissible by law. [O.C.G.A. § 14-2-129.]

Please return ONLY the original form below and applicable fee(s). For more information on Annual Registrations or to file online, visit http://www.sos.ga.gov/corporations/ Or, call 404-656-2817.

CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
Т	THE ABOVE INFORMATION HAS BEEN	UPDATED TO:		
CORPORATION NAME	ADDRESS	CITY	STATE	ZIP
New ERA Group Inc	610 McFarland 400 Drive	Alpharetta	Georgia	30004
CEO: Peter Vincent Williams	17 Grey Moss Road	Murrells Inlet	South Carolina	29576
CFO: Kenneth M Ponder	105 Laurel Lane	Cumming	Georgia	30040
SEC: Lee Ponder	610 McFarland 400 Drive	Alpharetta	Georgia	30004
AGT: Lynn G Morgan CPA	5975-C Parkway North Blvd	Cumming	Georgia	30040
I CERTIFY THAT I AM AUTHORIZED TO SIGN THIS FORM AND THAT THE INFORMATION IS TRUE AND CORRECT.	P.O. BOX NOT ACCEPTABLE FOR REGISTERED AGENT'S ADDRESS	COUNTY OF REGISTERED OFFICE:	Forsyth Cou	inty
AUTHORIZED SIGNATURE: Kenneth M	Ponder	Date:9/22/2014 4:32:5	5 PM	Total Due:
Title:Director	Email: Lynn@Lmorgancpa.com	•		\$30.00

BR201 2013 Corporation Annual Registration

144 168884051 0030004 NEWERAGROUPINCO000003 201406013 0055004

STATE OF GEORGIA

Secretary of State

Corporations Division 313 West Tower 2 Martin Luther King, Jr. Dr. Atlanta, Georgia 30334-1530

ANNUAL REGISTRATION

Electronically Filed Secretary of State

Filing Date: 3/29/2019 4:39:05 PM

BUSINESS INFORMATION

CONTROL NUMBER 14048832

BUSINESS NAME New ERA Group Inc

BUSINESS TYPE Domestic Nonprofit Corporation

EFFECTIVE DATE 03/29/2019

PRINCIPAL OFFICE ADDRESS

ADDRESS 610 McFarland 400 Drive, Alpharetta, GA, 30004, USA

REGISTERED AGENT

NAME ADDRESS COUNTY
Robert Slaughter 5975-C Parkway North Blvd, Cumming, GA, 30040, USA Forsyth

OFFICERS INFORMATION

NAME TITLE ADDRESS

Peter Vincent Williams CEO 17 Grey Moss Road, Murrells Inlet, USA
Lee Ponder SECRETARY 610 McFarland 400 Drive, Alpharetta, USA

Kenneth M Ponder CFO 105 Laurel Lane, Cumming, USA

AUTHORIZER INFORMATION

AUTHORIZER SIGNATURE Kenneth Ponder AUTHORIZER TITLE Registered Agent

ATTACHMENT C

12/23/22, 4:18 PM VIRGINIA - SCC

Entity Information

Entity Information

Entity Name: ALLIANCE FOR RESPONSIBLE ATMOSPHERIC

POLICY, INC.

Entity ID: F0389264

Entity Type: Nonstock Corporation

Entity Status: Active

Series LLC: N/A

Reason for Status: Active and In Good Standing

Formation Date: 10/07/1994

Status Date: 11/08/2022

VA Qualification Date: 10/07/1994

Period of Duration: Perpetual

Industry Code: 0 - General

Annual Report Due Date: N/A

Jurisdiction: TX

Charter Fee: \$100.00

Registration Fee Due Date: Not Required

Registered Agent Information

RA Type: Individual

Locality: ARLINGTON COUNTY

RA Qualification: Officer of the Corporation

Name: KEVIN J. FAY

Registered Office Address: 2111 WILSON BLVD., STE. 850, ARLINGTON, VA,

22201 - 0000, USA

Principal Office Address

Privacy Policy (https://www.scc.virginia.gov/privacy.aspx) Contact Us

(https://www.scc.virginia.gov/cir/cir_contact.aspx) Address: 2111 Wilson Blvd Fl 8, Arlington, VA, 22201 - 3043, (https://www.facebook.com/VirginiaStateCorporationCommission)

(https://twitter.com/VAStateCorpComm)

Principal Information

12/23/22, 4:18 PM

Title	Director	Name	Address	Last Updated
Treasurer	Yes	David Calabrese	601 13TH STREET NW STE 2005, WASHINGTON, DC, 20005 - 0000, USA	11/01/2021
Vice Chair	Yes	Nanette Lockwood	31161 Black Eagle Drive, Apt. 202, Evergreen, CO, 80439 - 0000, USA	11/01/2021
Executive Director	Yes	Kevin Fay	2111 Wilson Boulevard, 8th Floor, Arlington, VA, 22201, USA	11/01/2021
Chair	Yes	Karen Meyers	5600 Old Greenwood Road, P.O. Box 17010, Fort Smith, AR, 72917, USA	11/01/2021
Secretary	Yes	Kyle Gilley	223 Sunset Road, West Palm Beach, FL, 33401, USA	11/01/2021

Filing History RA History Name History Previous Registrations

Garnishment Designees Image Request

Back Return to Search Return to Results

Back to Login



ABOUT US

CALENDAR & EVENTS

NEWS

RESOURCES

LEGISLATIVE PRIORITIES

REFRIGERANT IMPORTS COMMITTEE

About us

ALLIANCE MEMBERSHIP LIST

The Alliance is committed to supporting policies and take actions in order to reduce HFC emissions 80% by 2050. Our members are investing in the development of next generation low global warming potential (GWP) alternative refrigerants and foam blowing agents, and of the equipment that utilizes these products.

A-Gas Americas



AGC Chemicals Americas



Air-Conditioning, Heating & Refrigeration Institute



Alliance for Polyurethanes
Addirates

American Pacific Corp.

Arkema









Auto Care Association



Brooks Automation, Inc.



Cap & Seal LLP



Carrier Corporation



Chemours



Consolidated Refrigerant Solutions



Coombs Gas



Daikin America



Daikin Applied

Add. 63a



Danfoss



Drinker, Biddle Wreath



Dynatemp International



E.V. Dunbar Co.



Emerson Climate Technologies



Falcon Safety Products







Halon Alternatives Research
Corporation



HARDI



Honeywell



Add. 64a

Hudson Technologies

Hussman

ICOR International







Ingersoll-Rand

International Pharmaceutical Aerosol Consortium









Lennox International



Metl-Span



Mexichem

Mexichem.







National Refrigerants



Nortek

Olin





Rheem Manufacturing Company



Ritchie Engineering



Spectrum Brands





AN INDUSTRY COALITION AND LEADING VOICE FOR VIABLE ENVIRONMENTAL POLICIES

2111 Wilson Blvd., 8th Floor Arlington, VA 22201 <u>+1 (703) 243-0344</u> (tel:17032430344) info@alliancepolicy.org ▼ FOLLOW US ON
TWITTER
(https://twitter.com/AtmosP

Add. 67a

DLN: 93493215007796

Form 990 囫

Department of the Treasury Internal Revenue Service

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Do not enter social security numbers on this form as it may be made public
 Information about Form 990 and its instructions is at www.IRS.gov/form990

OMB No 1545-0047

Open to Public Inspection

A F	or the 2015 c	alendar year, or tax year begin	ning 01-01-2015 , and ending 12-31-20	15			
☐ Ade	eck if applicable dress change	C Name of organization ALLIANCE FOR RESPONSIBLE ATM POLICY INC	MOSPHERIC		1111111111	oyer ide 20792:	ntification number
	me change	Doing business as					
	nal return	Number and street for P.O. box	if mail is not delivered to street address) Room/s	cuto	E Telepi	none num	ber
_	um/terminated	2111 WILSON BOULEVARD	ir mair is not delivered to street audiess) Roomi's	dice	(703) 243-0	344
	ended return plication pending	ARLINGTON, VA 22201	country, and ZIP or foreign postal code		G Gross	receipts s	808,490
		F Name and address of p Kevin Fay	orincipal officer	H(b) A	this a grou ibordinates re all subord cluded?	linates	FYes ₹No
T Ta	x-exempt status	s \(\Gamma \) 501(c)(3) \(\Gamma \) 501(c)(6)	◀ (insert no)	200.20	"No," attac roup exemp		(see instructions)
_	ebsite: ► wv			1,(0)	roup exemp	rion dai	liber -
K Fon	m of organizatio	n Corporation Trust Associ	ation Other ►	L Year o	of formation 1	994 M	State of legal domicile: VA
Pa	rt I Sun	nmary					
5			ion or most significant activities				
2	See Part	III, Line 1	- 10 to 100 to 100 to 100				
Ee .							
Ba							
Activities & Governance	2 Check t	his box 🚩 if the organization	discontinued its operations or disposed	of more tha	n 25% of its	net as	sets
5	3 Number	of voting mambace of the gove	sraing hady (Part VI June 19)			3	28
50 50	11 (0.00)		rning body (Part VI, line 1a) rs of the governing body (Part VI, line 1b		* *	4	28
Tie.			in calendar year 2015 (Part V, line 2a)		4 4	5	0
Ę			fnecessary)			6	
ď	The Control of the Co		Part VIII, column (C), line 12			7a	159,701
	100		from Form 990-T, line 34 ,			7b	
				-	Prior Year		Current Year
	8 Cont	ributions and grants (Part VIII	, line 1h)				0
316	9 Prog	ram service revenue (Part VIII	(, line 2g)		652	,100	648,612
Revenue	10 Inve	stment income (Part VIII, colu	imn (A), lines 3, 4, and 7d)	7		145	177
I	11 Othe	r revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)				159,701
	12 Tota 12)	revenue—add lines 8 through	11 (must equal Part VIII, column (A), In	ne	652	,245	808,490
	13 Gran	ts and similar amounts paid (P	art IX, column (A), lines 1-3)				0
	14 Bene	fits paid to or for members (Pa	rt IX, column (A), line 4)				Ó
60			oyee benefits (Part IX, column (A), lines				0
1368	5-10 16a Profe	essional fundraising fees (Part	IX column (A) line 11e)				0
EXPE	10 4 2 4	fundraising expenses (Part IX, column		1			
a	0.000		(), lines 11a-11d, 11f-24e)		586	,549	706,466
	100		must equal Part IX, column (A), line 25)			,549	706,466
	1000	그러워 얼마나 하지 않아 얼마를 다 하는데 이 때문에 다른	ne 18 from line 12			304	102,024
Net Assets of Fund Balances				Beginnin	ng of Current	Year	End of Year
Set	20 Total	l assets (Part X, line 16)			318	,415	436,621
A B	The second second	l liabilities (Part X, line 26) .				,234	19,415
ž.	22 Net a	ssets or fund balances Subtra	act line 21 from line 20		315	,182	417,206
Pai	t II Sig	nature Block					
my k	nowledge and arer has any l	belief, it is true, correct, and c	examined this return, including accompa complete Declaration of preparer (other				
Her	100	vin Fay Executive Director be or print name and title					
	- 1	Print/Type preparer's name Douglas 1 Alcorn CPA	Preparer's signature Douglas J Alcorn CPA		Check ☐ if	PTIN	0476
Paid		AN ACT LANGUAGE	7.Q * D # (*.C # Q *)**		sell-employed	1,0000	
	parer	Firm's name ALCORN & CURETO Firm's address 4604 B Pinecrest Of			Phone no (70	3) 351-7	750
Use	Only	Victorial Control of the Control			rusus in Ma	-,	
May	Add. 6	8a Alexandria, VA 223	r shown above? (see instructions)		7.585e5		Yes No
July A	THE TUD MIDE	(22 YULD LEVALUE MICH THE BLEDALE	1 SHAMI BROKE, ISEG HISTIACTIONS) + 1		4 4 4	X X Y	1621 140

Par	Partiti Statement of Program Service Accomplishments Check if Schedule O contains a response or note to any line in this Part III Briefly describe the organization's mission	: Accomplishments se or note to any line in this Part I	II	
FLO I	THE ALLIANCE'S PURPOSES OF ORGANIZATION ARE TO ENSURE THAT GOVERNMENT DIRECTIVES AND POLICIES FOR FLOUROCARBONS ARE REASONABLY SOUND AND ECONOMICALLY AND TECHNICALLY EFFECTIVE, TO COOPERATE WITH AND ASSIST GOVERNMENTAL BODIES WITH RESPECT TO SUCH DIRECTIVES AND POLICIES AND TO MAINTAIN AN AWARENESS AMONG MEMBERS OF LEGISLATIVE, REGULATORY, SCIENTIFIC AND OTHER AREAS RELEVANT TO REGULATION OF FLOUROCARBONS THE ABOVE EXEMPT FUNCTION INCOME MEETS THESE PURPOSES	N ARE TO ENSURE THAT GOVER ND ECONOMICALLY AND TECHNIT TO SUCH DIRECTIVES AND PRY, SCIENTIFIC AND OTHER ARTON INCOME MEETS THESE PUR	NMENT DIRECTIVES AND PC NICALLY EFFECTIVE, TO COO OCLICIES AND TO MAINTAIN REAS RELEVANT TO REGULA RPOSES	OLICIES FOR OPERATE WI ON AWAREN TION OF
7	Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ?	ant program services during the year	ig the year which were not listed on	TYes FNo
m	Did the organization cease conducting, or make significant changes in how it conducts, any program services? 11 "Yes," describe these changes on Schedule O	ce significant changes in how it condi	nducts, any program	TYes FNo
4	Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported	ccomplishments for each of its thr rganizations are required to report ch program service reported	ree largest program services, a t the amount of grants and alloc	s measured by ations to other
4	(Code) (Expenses \$ 559,684 including grants of \$) (Revenue \$ CONFERENCES AND MEETINGS - COMMUNICATION TO MEMBERS, PUBLIC AND MEDIA ON ISSUES RELATED TO FLOUROCARBONS	559,684 including grants of \$ MEMBERS, PUBLIC AND MEDIA ON ISSUE) (Revenue \$:S RELATED TO FLOUROCARBONS	648,612)
4	(Code) (Expenses \$ including grants of \$) (Revenue \$) REGULATORY ACTION PROGRAM - PREPARATION OF COMMENTS IN ORDER TO EDUCATE AND KEEP REGULATORY OFFICIALS AND BODIES INFORMED ABOUT FLOUROCARBON ISSUES AT STATE/LOCAL LEVELS	including grants of \$ OMMENTS IN ORDER TO EDUCATE AND KE) (Revenue \$ EEP REGULATORY OFFICIALS AND BOD) JES INFORMED AE
4	(Code) (Expenses \$	mcluding grants of \$) (Revenue \$	
		ć		
4	Other program services (Describe in Schedule O) (Expenses \$ Including gra	schedule O) including grants of \$) (Revenue \$	
46	Total program service expenses	559,684		

Par	t IV Checklist of Required Schedules		Yes	No
1	Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A	1		No
2	Is the organization required to complete Schedule B, Schedule of Contributors (see instructions)?	2		No
3	Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I	3		No
4	Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II	4		No
5	Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III	5	Yes	
6	Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I	6		No
7	나를 살았다. 전기 이렇게 이렇게 이렇게 되면 시간을 시간을 시간했다고 있는데 되는데 되었다. 사이를 받는데 그렇게 되었다. 하게 되었다면 하게 하게 되는데 때문을 때문에 다른데 그렇다면 하다고 있다면 하게 되었다면 하게 되었	7		No
8	Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III	8		No
9	Did the organization report an amount in Part X, line 21 for escrow or custodial account liability, serve as a custodian for amounts not listed in Part X, or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV	9		No
10	Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi-endowments? If "Yes," complete Schedule D, Part V 😼	10		No
11	If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VIII, VIII, IX, or X as applicable			12
	Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI.	11a	=1	No
	Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII 📽	11b	=1	No
	Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII	11c		No
	Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX 🕏	11d		No
e	Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X	11e	Yes	
f	Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X	11f		No
12a	Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII	12a		No
b	Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional "Salary "Salary".	12b		No
13	Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13		No
14a	Did the organization maintain an office, employees, or agents outside of the United States?	14a		No
b	Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV	14b		No
15	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV	15		No
16	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16		No
17	IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I (see instructions)	17	=1	No
18	VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II	18		No
	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III	19		No
	Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H	20a		No
b	If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?	20b	1	

	year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part I	25b	1	No
26	Did the organization report any amount on Part X, line 5, 6, or 22 for receivables from or payables to any current or former officers, directors, trustees, key employees, highest compensated employees, or disqualified persons? If "Yes," complete Schedule L, Part II	26		No
27	Did the organization provide a grant or other assistance to an officer, director, trustee, key employee, substantial contributor or employee thereof, a grant selection committee member, or to a 35% controlled entity or family member of any of these persons? If "Yes," complete Schedule L, Part III	27		No
28	Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions)			
a	A current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L,			
	Part IV	28a		No
b	A family member of a current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part IV	28b		No
c	An entity of which a current or former officer, director, trustee, or key employee (or a family member thereof) was an officer, director, trustee, or direct or indirect owner? If "Yes," complete Schedule L, Part IV	28c	Yes	
29	Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule M	29		No
30	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? If "Yes," complete Schedule M	30		No
31	Did the organization liquidate, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, Part I .	31		No
32	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete Schedule N, Part II	32		No
33	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301 7701-2 and 301 7701-3? If "Yes," complete Schedule R, Part 1	33		No
34	Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1	34		No
35a	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	35a		No
ь	If "Yes' to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section $512(b)(13)$? If "Yes," complete Schedule R, Part V, line 2	35b	$\equiv 1$	No
36	Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? If "Yes," complete Schedule R, Part V, line 2	36	=1	No
37	Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI	37		No
38	Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and 19? Note. All Form 990 filers are required to complete Schedule O	38		No

Par	tV	Statements Regarding Other IRS Filings and Tax Complianc Check if Schedule O contains a response or note to any line in this				, IZ
	-	Check it ochequie o contains a response or note to any line in this	rait V		Yes	No
1a	Enter	the number reported in Box 3 of Form 1096 Enter -0- if not applicable	1a 1	- 1	T	
b	Enter	the number of Forms W-2G included in line 1a Enter-0- if not applicable	1b 0			
c	Did th	ne organization comply with backup withholding rules for reportable payments to ng (gambling) winnings to prize winners?	vendors and reportable	1c	Yes	
2a	TaxS	the number of employees reported on Form W-3, Transmittal of Wage and statements, filed for the calendar year ending with or within the year covered is return	2a 0	ì		
b	Ifatl	east one is reported on line 2a, did the organization file all required federal emp If the sum of lines 1a and 2a is greater than 250, you may be required to e-file		2b		No
За	Did th	ne organization have unrelated business gross income of \$1,000 or more during	g the year?	За	Yes	14 4 4
b	If"Ye	s," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation	on in Schedule O	3b		No
4a	over,	y time during the calendar year, did the organization have an interest in, or a si a financial account in a foreign country (such as a bank account, securities acount)?		4a		No
ь		es," enter the name of the foreign country	and Financial Accounts			
5a		the organization a party to a prohibited tax shelter transaction at any time during	ig the tax year?	5a		No
b	Did ar	ny taxable party notify the organization that it was or is a party to a prohibited	tax shelter transaction?	5b		No
c	If "Ye	es," to line 5a or 5b, did the organization file Form 8886-T?	I i v en re sh	35		
2,		7, 12,000 2 2 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3		5c		
	organ	the organization have annual gross receipts that are normally greater than \$10 ization solicit any contributions that were not tax deductible as charitable cont	ributions?	ба	Yes	
	were r	es," did the organization include with every solicitation an express statement the not tax deductible?		6b	Yes	
7 a		nizations that may receive deductible contributions under section 170(c). ne organization receive a payment in excess of \$75 made partly as a contributi	on and partly for goods and	7a		1
		ces provided to the payor?		7b		
		ne organization sell, exchange, or otherwise dispose of tangible personal proper		-		
		orm 8282?		7c		
d	If"Ye	es," indicate the number of Forms 8282 filed during the year	7d			
e	Did th	ne organization receive any funds, directly or indirectly, to pay premiums on a p	ersonal benefit contract?	7e		
f	Did th	ne organization, during the year, pay premiums, directly or indirectly, on a perso	onal benefit contract?	7f		
g		organization received a contribution of qualified intellectual property, did the ored?		7g		
h		organization received a contribution of cars, boats, airplanes, or other vehicles	s, did the organization file a	7h		
8	Did a	soring organizations maintaining donor advised funds. donor advised fund maintained by the sponsoring organization have excess bu g the year?		Ч		
0-				8		No
		ne sponsoring organization make any taxable distributions under section 4966 ne sponsoring organization make a distribution to a donor, dönor advisor, or rela		9a 9b		No
10		on 501(c)(7) organizations. Enter	ited person?	90		140
		tion fees and capital contributions included on Part VIII, line 12	10a			-
		receipts, included on Form 990, Part VIII, line 12, for public use of club	10ь		<u>,</u> ==,	<u> </u>
11	Section	on 501(c)(12) organizations. Enter			<u> </u>	
a	Gross	s income from members or shareholders	11a	- p		
b		s income from other sources (Do not net amounts due or paid to other sources st amounts due or received from them)	116			
12a	Section	on 4947(a)(1) non-exempt charitable trusts.Is the organization filing Form 990	in lieu of Form 1041?	12a		No
b	If"Ye year	es," enter the amount of tax-exempt interest received or accrued during the	12b			
13	Section	on 501(c)(29) qualified nonprofit health insurance issuers.				
a		organization licensed to issue qualified health plans in more than one state? No constitution on the organization must report on Schedule O	ote. See the instructions for	13a		No
b	Enter	the amount of reserves the organization is required to maintain by the states ich the organization is licensed to issue qualified health plans	13b			
c	Enter	the amount of reserves on hand	13c	(E = 1		
14a	Did th	ne or $\mathbf{A}_{\mathbf{d}\mathbf{d}}$ tio 72 \mathbf{a} eive any payments for indoor tanning services during the tax	year?	14a		No
ь	If "Ye	es," has it filed a Form 720 to report these payments? If "No," provide an explana	tion in Schedule O	14b		

Part VI	Governance.	Management.	, and Disclosure

For each "Yes" response to lines 2 through 7b below, and for a "No" response to lines 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions.

Se	ection A. Governing Body and Management						
	Foliantia anni a se como a com	1		- 24		Yes	No
14	Enter the number of voting members of the governing body at the end of the tax year	1a		2.8			
	If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain in Schedule O						
b	Enter the number of voting members included in line 1a, above, who are independent	1b		28			11
2	Did any officer, director, trustee, or key employee have a family relationship or a bus other officer, director, trustee, or key employee?				2		No
3	Did the organization delegate control over management duties customarily performe supervision of officers, directors or trustees, or key employees to a management co				3	Yes	1
4	Did the organization make any significant changes to its governing documents since filed?		rior Form 9	90 was	4	= 1	No
5	Did the organization become aware during the year of a significant diversion of the o	rganız	ation's ass	ets? .	5		No
6	Did the organization have members or stockholders?				6		No
7a	Did the organization have members, stockholders, or other persons who had the pow more members of the governing body?	erto e	elect or app	point one or	7a		No
b	Are any governance decisions of the organization reserved to (or subject to approva or persons other than the governing body?	l by) n	nembers, s	tockholders,	7b		No
8	Did the organization contemporaneously document the meetings held or written active year by the following						
a	The governing body?				8a	Yes	19-9-
b	Each committee with authority to act on behalf of the governing body? $\ \ , \ \ \ , \ \ \ .$				8b		No
9	Is there any officer, director, trustee, or key employee listed in Part VII, Section A, organization's mailing address? If "Yes," provide the names and addresses in Schedule				9	Yes	1
Se	ection B. Policies (This Section B requests information about policies not	regui	red by th	e Internal R	eveni		e.)
						Yes	No
	Did the organization have local chapters, branches, or affiliates?			40.0	10a		No
	If "Yes," did the organization have written policies and procedures governing the act affiliates, and branches to ensure their operations are consistent with the organization.	on's e	xempt purp	oses?	10b		
	Has the organization provided a complete copy of this Form 990 to all members of it the form?		7 11 1	F 14 (41)	11a	Yes	
	Describe in Schedule O the process, if any, used by the organization to review this F			the second second			L-
	Did the organization have a written conflict of interest policy? If "No," go to line 13 .				12a	Yes	
	Were officers, directors, or trustees, and key employees required to disclose annual rise to conflicts?		A 6 A	* * *	12b	Yes	
	Did the organization regularly and consistently monitor and enforce compliance with in Schedule O how this was done				12c	Yes	
13	Did the organization have a written whistleblower policy?		4. 4. 4	1 2 1	13	Yes	
14	Did the organization have a written document retention and destruction policy?	v e			14	Yes	
	Did the process for determining compensation of the following persons include a revindependent persons, comparability data, and contemporaneous substantiation of the	e deli	peration ar	id decision?			
	The organization's CEO, Executive Director, or top management official		4 4 E	0.313	15a		No
ь	O ther officers or key employees of the organization $\ldots \ldots \ldots$	6		6.6	15b	-	No
	If "Yes" to line 15a or 15b, describe the process in Schedule O (see instructions)						
16a	Did the organization invest in, contribute assets to, or participate in a joint venture of taxable entity during the year? \dots				16a		No
ь	If "Yes," did the organization follow a written policy or procedure requiring the organization in joint venture arrangements under applicable federal tax law, and take organization's exempt status with respect to such arrangements?	e step	s to safegu	ard the	16b		
Se	ction C. Disclosure						
17	List the States with which a copy of this Form 990 is required to be filed▶						
18	Section 6104 requires an organization to make its Form 1023 (or 1024 if applicable	e), 990), and 990	-T (501(c)			

- (3)s only) available for public inspection. Indicate how you made these available. Check all that apply Own website Another's website V Upon request Other (explain in Schedule O)
- Describe in Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year
- State the name, address, and telephone number of the person who possesses the organization's books and records ►Kevin Fay A2411 70 SON BOULEVARD Arlington, VA 22201 (703) 243-0344

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Page 7

Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

1a Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.

- ◆ List all of the organization's current officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation Enter 0 in columns (D), (E), and (F) if no compensation was paid
 - List all of the organization's current key employees, if any See instructions for definition of "key employee"
- ♣ List the organization's five current highest compensated employees (other than an officer, director, trustee or key employee) who received reportable compensation (Box 5 of Form W-2 and/or Box 7 of Form 1099-MISC) of more than \$100,000 from the organization and any related organizations
- * List all of the organization's former officers, key employees, or highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations
- List all of the organization's former directors or trustees that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations
- List persons in the following order individual trustees or directors, institutional trustees, officers, key employees, highest compensated employees, and former such persons

Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee

(A) Name and Title	(B) A verage hours per week (list any hours	more	than on is	one bot	not boo	chec x, unle n offic rustee	ess er	(D) Reportable compensation from the organization	(E) Reportable compensation from related organizations (W- 2/1099- MISC)	(F) Estimated amount of other compensation
		Individual trustee or director	Institutional Trustee	Officer	Key employee	Highest compensated employee	Folmer	(W- 2/1099- MISC)		from the organization and related organizations
(1) See Attached See Attached	0 00	X						ŋ	ō	0
-										
÷										
-										
-				_	_					Form 990 /2015)

art VII	Section A. Office	ers, Directors,	Trustees, Ke	y Employees,	and Highest (Compensated Em	ployees (continued)

organizations below dotted (ine) Description Descrip		(A) Name and Title	(B) Average hours per week (list any hours	more pers	than on is	one both	box,	heck unless officer stee)		(D) Reportable compensatio from the organization (n con fro W- organ	(E) eportable npensation m related nizations (W-	(F) Estimated amount of other compensation from the
c Total from continuation sheets to Part VII, Section A d Total (add lines 1b and 1c) 2 Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization ▶ 0 3 Did the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule I for such individual 4 For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule I for such individual 5 Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If "Yes," complete Schedule I for such person 5 N Section B. Independent Contractors 1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization Report compensation for the calendar year ending with or within the organization's tax year (A) No Nea and business address Compensation (B) CC) Compensation Compe			below		Institutional Trustee	tional	Key employee	Highest compensated employee	Former	2/1099-M15	2/10	J99-MISC)	organization and related organizations
Total from continuation sheets to Part VII, Section A d Total (add lines 1b and 1c) Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization ▶ 0 Jud the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule I for such individual For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule I for such individual Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If "Yes," complete Schedule I for such person Section B. Independent Contractors Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization Report compensation for the calendar year ending with or within the organization's tax year (A) Name and business address Lobbying & Mgmt S57 Z111 Wilson Blvd						F							
Total from continuation sheets to Part VII, Section A d Total (add lines 1b and 1c) Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization ▶ 0 Jud the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule I for such individual For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule I for such individual Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If "Yes," complete Schedule I for such person Section B. Independent Contractors Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization Report compensation for the calendar year ending with or within the organization's tax year (A) Name and business address Lobbying & Mgml S57 Judical Report Compensation Report Compensation Report Compensation of Services Lobbying & Mgml S57					F								
Total from continuation sheets to Part VII, Section A d Total (add lines 1b and 1c) Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization ▶ 0 Jud the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule I for such individual For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule I for such individual Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If "Yes," complete Schedule I for such person Section B. Independent Contractors Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization Report compensation for the calendar year ending with or within the organization's tax year (A) Name and business address Lobbying & Mgmt S57 Z111 Wilson Blvd					E								
Total from continuation sheets to Part VII, Section A d Total (add lines 1b and 1c) Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization ▶ 0 Jud the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule I for such individual For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule I for such individual Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If "Yes," complete Schedule I for such person Section B. Independent Contractors Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization Report compensation for the calendar year ending with or within the organization's tax year (A) Name and business address Lobbying & Mgmt S57 Z111 Wilson Blvd						F	F						
Total from continuation sheets to Part VII, Section A d Total (add lines 1b and 1c) Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization ▶ 0 Jud the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule I for such individual For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule I for such individual Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If "Yes," complete Schedule I for such person Section B. Independent Contractors Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization Report compensation for the calendar year ending with or within the organization's tax year (A) Name and business address Lobbying & Mgmt S57 Z111 Wilson Blvd					E			-					
Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization ▶ 0 Yes N Did the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule J for such individual	c	Total from continuation sh	eets to Part VII, S	ection	Α.	*	9.1	2. Þ		1 11			
Did the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule J for such individual	2							d abov	e) w	ho received mor	e than		
4 For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule J for such individual	3	Did the organization list an on line 1a? If "Yes," comple	y former officer, di te Schedule I for su	rector o	or trus	stee •	, key	emplo	yee,		pensated (
Section B. Independent Contractors 1. Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization Report compensation for the calendar year ending with or within the organization's tax year (A) Name and business address Alcalde & Fay Lobbying & Mgml 557	4	organization and related or										i the	
1. Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year. (A) (B) (C) (B) (C) (Description of services Alcalde & Fay 2111 Wilson Blvd	5									The second second second second second	7 10 10 102		5 No
Compensation from the organization Report compensation for the calendar year ending with or within the organization's tax year (A) Name and business address Alcalde & Fay 2111 Wilson Blvd (B) Description of services Compensation Compensation Compensation Compensation Stay year Compensation Compen	S	ection B. Independent	Contractors										
Name and business address Description of services Compensation Alcalde & Fay Lobbying & Mgmt 557 2111 Wilson Blvd	1.		anization Report c								r within th	e organizatioi	n's tax year
2111 Wilson Blvd				address							Description		Compensation
										Lobby	ng & Mgmt		557,201
2 Total number of independent contractors (including but not limited to those listed above) who received more than													

Ĭ	2		dule O contains a respo		(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512-514
0	1a	Federated can	npaigns 1a				-	312 314
continuations, office, orants and Other Similar Amounts	b	Membership d	ues 11	b	-			
mo	c	Fundraising ev	vents 10	c .				
IL A	d	Related organi	izations 10	1	-			
nila	e	Government gran		-				
er Sir	f	All other contribut	tions, gifts, grants, and 10 not included above	-				
and Other Similar Amounts	g		tions included in lines					
anc	h	Total. Add line	es 1a-1f		0			
	2a	Membership Dues	& Accordments	Business Code	649.500	540.543		
Program Service Revenue	b	- Heimbership Dues	o or Wassessillettie	+	648,612	648,612		
	c			+				-
	d							
	e	-	-	1				
	f	All other progr	ram service revenue	-				
	100			L				
-			es 2a-2f		648,612			
	3		come (including divide lar amounts)		177	177		
	4	Income from inve	estment of tax-exempt bond	proceeds , . >	0			
	5	Royalties ,	(i) Real	(n) Personal	0			
	6a	Gross rents						
	b	Less rental expenses						
	c	Rental income or (loss)						
	d	Net rental inco	ome or (loss)	- K. () .	0			
	7a	Gross amount from sales of assets other than inventory	(i) Securities	(ii) Other				
	ь	Less cost or other basis and						
	c	sales expenses Gain or (loss)						
	d		SS)	THE REAL PROPERTY.	0			
	oa	events (not inc	from fundraising cluding series (cluding series) is reported on line 1c)					
	ľ	See Part IV, II	ne 18 🗸 .					
	100		xpenses t					
	1 4 7	Gross income	(loss) from fundraising from gaming activities ne 19		-0			
	h	Less direct of	xpenses					
			(loss) from gaming act		0			
	1.0		finventory, less lowances					
		Carle Luberal	a					
	11 11 11 11	Alam take the state of the stat	goods sold b (loss) from sales of inv	ventory	Ö			
	1	Miscellaneou		Business Code	1			l-
ľ	11a	- ASSESSMEN		W037-1681				
	b	-						
	c	-	-					
	179,4	All other reven	nue					
		d. 76a line			20.00	· '		
	Ad	d. /ba	. See Instructions .		159,701			
1.14	~~	. oral revenue.	· Instructions .		808,490	648,789	159,701	

Part IX Statement of Functional Expenses

	Check if Schedule O contains a response or note to any line in to it include amounts reported on lines 6b, b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1	Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21	0		general engenees	as particos
2	Grants and other assistance to domestic individuals. See Part IV, line 22	0			
3	Grants and other assistance to foreign organizations, foreign governments, and foreign individuals See Part IV, lines 15 and 16	0			
4	Benefits paid to or for members ,	0			
5		0			
6		0			
7	Other salaries and wages	0			
8	Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)	0			
9	Other employee benefits	0			
10	Payroll taxes	0			
11	Fees for services (non-employees)				
а	Management	557,201	445,761	111,440	
b	Legal	35,490	28,392	7,098	
c	Accounting	0			
d	Lobbying	0			
e	Professional fundraising services See Part IV, line 17	O			
f	Investment management fees	0			
g	Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O)	0			
12	Advertising and promotion	0			
13	Office expenses	14,160	11,328	2,832	
4	Information technology	0			
.5	Royalties	0			
6	Occupancy	0			
7	Travel	56,549	32,749	23,800	
18	Payments of travel or entertainment expenses for any federal, state, or local public officials	0	1		
19	Conferences, conventions, and meetings	35,010	35,010		
20	Interest	0			
21	Payments to affiliates	0			
22	Depreciation, depletion, and amortization	D			
23	Insurance	0			
24	Other expenses Itemize expenses not covered above (List miscellaneous expenses in line 24e If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O)				
а	Finance & Managment	5,018	4,014	1,004	
ь	Communications	2,563	2,050	513	
c	Meeting	344	275	69	
d	Bank Fees	131	105	26	
e	All other expenses	0			
25	Total functional expenses. Add lines 1 through 24e	706,466	559,684	146,782	
26	Joint costs.Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation Check here (ASC 958-720)				

Par	tΧ	Balance Sheet Check if Schedule O contains a response or note to any line in t	his Part X			
				(A) Beginning of year	ĪΞ	(B) End of year
	1	Cash-non-interest-bearing	0.0.0.1	46,498	1	0
	2	Savings and temporary cash investments		268,168	2	436,620
	3	Pledges and grants receivable, net			3	0
	4	Accounts receivable, net		3,750	4	.0
	5	Loans and other receivables from current and former officers, trustees, key employees, and highest compensated employee II of Schedule L				-
		AND THE RESERVE TO TH		1	5	0
Assets	6	Loans and other receivables from other disqualified persons (section 4958(f)(1)), persons described in section 4958(c)(3) contributing employers and sponsoring organizations of sectivoluntary employees' beneficiary organizations (see instruction Part II of Schedule L	(B), and on 501(c)(9)		6	0
As	7	Notes and loans receivable, net			7	0
	8	Inventories for sale or use			8	0
	9	Prepaid expenses and deferred charges			9	0
	10a	Land, buildings, and equipment cost or other basis Complete Part VI of Schedule D	10a			
	ь	Less accumulated depreciation	10b		10c	0
	11	Investments—publicly traded securities		11	.0	
	12	Investments—other securities See Part IV, line 11			12	0
	13	Investments—program-related See Part IV, line 11			13	0
	14	Intangible assets	4		14	0
	15	Other assets See Part IV, line 11			15	9
	16	Total assets.Add lines 1 through 15 (must equal line 34) .		318,416	16	436,621
-	17	Accounts payable and accrued expenses		-16	17	6,915
	18	Grants payable			18	
	19	Deferred revenue		3,250	19	
	20	Tax-exempt bond liabilities		3.1	20	-
	21	Escrow or custodial account liability Complete Part IV of Sch			21	
ities	22	Loans and other payables to current and former officers, direct key employees, highest compensated employees, and disqua				
Liabil		persons Complete Part II of Schedule L	10000		22	
=	23	Secured mortgages and notes payable to unrelated third parti	es		23	
	24	Unsecured notes and loans payable to unrelated third parties		1	24	
	25	Other liabilities (including federal income tax, payables to reland other liabilities not included on lines 17-24) Complete Part X of Schedule D			25	12 500
	20	TALLER AND		3,234	25	12,500 19,415
_	26	Total liabilities, Add lines 17 through 25			26	19,415
Φ.		lines 27 through 29, and lines 33 and 34.	y and complete	a manage		
Juc.	27	Unrestricted net assets ,		315,182	27	417,206
63	28	Temporarily restricted net assets			28	
=	29	Permanently restricted net assets			29	
r Fund Balance		Organizations that do not follow SFAS 117 (ASC 958), check complete lines 30 through 34.	here ▶ ┌ and		4	
0	30	Capital stock or trust principal, or current funds	0.741.0	9 - 11	30	
Assets or	31	Paid-in or capital surplus, or land, building or equipment fund			31	
As	32	Retained earnings, endowment, accumulated income, or other			32	
Net	33	Total net assets or fund balances		315,182	33	417,206
Z	34	Total liabilities and net assets/fund balances		318,416	34	436,621

Form 990 (2015)

Page 12

(Form 990 or 990-FZ)				
Department of the Treasury trental Revenue Service	For Organizations Exempt From Income Tax Under section 501(c) and section 527 • Complete if the organization is described below, • Attack to Form 990 or Form 990-EZ. • Information about Schedule C (Form 990 or 990-EZ) and its instructions is at • WWW.its.gov/form990.	Fax Under section blow, PAttach to Fo 990 or 990-EZ) and it v/form990.	501(c) and section 527 m 990 or Forn 990-Ez. s instructions is at	2015
the organization an Section 501(c)(3) or Section 501 organization an the organization an the organization an Section 501(c)(3) organization an	if the organization answered "Yes" on Form 990, Part IV, Line 3, or Form 990-Ez, Part V, line 46 (Political Campaign Activities), then • Section 501(c)(3) organizations. Complete Parts 4.4 and 8 Do not complete Part 1.C. • Section 501(c) (other than section 501(c)(3)) organizations. Complete Parts 4.4 and 0.0 before 50 before 0.0 before 1.0 before 50 b	or Form 990-EZ, Par riplete Part LC Parts LA and Cibelo or Form 990-EZ, Par nder section 501(h))	t V, line 46 (Political Can w. Do not complete Part EE t VI, line 47 (Lobbying A Complete Part II. Do not (h)) Complete Part II. Do	in paign Activities), then the ctivities, then services, then convice Part # B not complete Part # B
the organization an ne 35c (Proxy Tax) (! • Section 501(c)(4), (If the organization answered "Yes" on Form 990, Part IV, Line 5 (Fine 35c (Proxy Tax) (see separate instructions), then Section 501(c)(4), (5), or (5) organizations. Complete Part III	Proxy Tax) (see se	parate instructions) or F	orm 990-EZ, Part V.
Name of the organization ALIANCE FOR RESPONSIBLE ATMOSPHERIC POLICY INC.	SIE ATMOSPHERIC		Employer ident	Employer identification number
art I-A Complei	Partical Complete if the organization is exempt under section 501(c) or is a section 527 organization.	r section 501(c	or is a section 527	organization.
1 Provide a descrip	Provide a description of the organization's direct and indirect political campaign activities in Part IV	itical campaign activ	ities in ParcTV	
Political expenditures				
3 Valunteer hours				
Part 1-8 Complet	Complete if the organization is exempt under section 501(c)(3).	r section 501(c)		
	Cheek the amount of any excise cax incurso by the organization principle section = 90.5	Today section 1900		
	ביונפי גווף מווסטוני טימון באבוספ ומא ווובטוסט טי טימפווגמטטון וומווסטפיס שומפי ספרניטון אססס	מחבוים חומבו אנכיוחווי		h
3 If the organization	If the arganization incurred a section 4955 tax, did it file Form 4720 for this year?	720 for this year?		□ Yes ☐ No
4a Was a correction made?	-			
T Yes T No				
b If Yes, describe	b 1(-Yes," describe in Part IV Part I-C Complete if the organization is exempt under section 501(c), except section 501(c)(3). 1 False the amount describe exceeded by the filtra production for section 527 exempt function activities.	r section 501(c)	, except section 501	1(c)(3).
ter the amount of the empt function activit	Enter the amount of the filing organization's funds contributed to other organizations for section \$27	organizations for sec	Tion 527	
*				
3 Total exempt fun	Total exempt function expenditures. Add lines 1 and 2. Enter here and on Form 3120-PDL, line 176	e and on Form 1120		
the filing organizati	4 Did the filing organization file Form 1120-POL for this year?			
5 Enter the names, organization mad amount of politics separate segrega	F7 No. Enter the names, addresses and employer identification number (EIN) or all section 527 political organizations to which the filing organization made payments. For each organization listed, enter the amount paid from the filing organization's funds. Also enter the amount of political contributions received that were promptly and identity delivered to a separate political contributions received that were promptly and identity delivered to a separate political organization, such as a separate segmentated fund or a political action committee (PAC.) If additional spaces is needed, provide information in Part IV.	(EEN) of all section 5 the amount paid from idirectly delivered to If additional space is	27 political organizations the filing organization's fi a separate political organ needed, provide informat	to which the filing unds. Also enter the irration, such as a for in Part IV.
(a) Name	(b) Address	(O) EIN	(d) Amount paid from filing organization's. hinds If none, enter -0-	(e) Amount of political contributions received and promptly and directly delivered to a sugarate political organization If none, enter-0-

Page 2

(b) Affiliated group totals

(a) Filing organization's totals

Part IL-A Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)).

|--|

B Check ► [If the filing organization checked box A and "limited control" provisions apply

(The term "expenditures" means amounts paid or incurred.) Total lobbying expenditures to influence responsibilities to influence a legislative body (direct lobbying)

Total lobbying expenditures to influence a legislative body (direct lobbying) Limits on Lobbying Expenditures

Total exempt purpose expenditures (add lines 1c and 1d)

175,000 plus 10% of the excess over \$1,000,000 \$225,000 plus 5% of the excess over \$1,500,000 100,000 plus 15% of the excess over \$500,000 Lobbying nontaxable amount. Enter the amount from the following table in both columns The lobbying nontaxable amount is: 0% of the amount on line 1e 1,000,000 If the amount on line 1e, column (a) or (b) is: wer \$1,500,000 but not over \$17,000,000 ver \$1,000,000 but not over \$1,500,000 ver \$500,000 but not over \$1,000,000 ver \$17,000,000

Grassroots nontaxable amount (enter 25% of line 1f) 5 Subtract line 1g from line 1a If zero or less, enter-0-£

Subtract line If from line 1c If zero or less, enter -0-

If there is an amount other than zero on either line 1h or line 11, did the organization file Form 4720 reporting section 4911 tax for this year?

Y es ž 4-Year Averaging Period Under section 501(h) (Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the separate instructions for lines 2a through 2f.)

	Lobbying Expe	Lobbying Expenditures During 4-Year Averaging Period	4-Year Avera	ging Period		
	Calendar year (or fiscal year beginning in)	(a)2012	(b)2013	(c)2014	(d)2015	(e) Total
· co	2a Lobbying nontaxable amount					
Δ.	 Lobbying ceiling amount (150% of line 2a, column(e)) 					
U	c Total lobbying expenditures					
0	d Grassroots nontaxable amount					
a	Grassroots celling amount (150% of line 2d, column (e))					
4-	f Grassroots lobbying expenditures					

Schedule C (Form 990 or 990-EZ) 2015

An analysis of the second can be a stricting it to benice denotes in the 1 for administration of the second and the second can be a strictly as a strictly to inclinate a solds: quantum to the second can be a strictly as a strictly to inclinate a solds: quantum to the second can be a strictly as a strictly to inclinate a solds: quantum to the second can be a strictly as a strictly to inclinate a solds: quantum to the second can be a strictly as a strictly to inclinate a solds: quantum to the second can be a strictly as a strictly to inclinate a sold can be a strictly as	filed Form 5768 (election under section 501(h)).	
The complete is the thing expensioned actument to inchesions breagon, nationed, store or incention of the complete is the complete in the comp	each "Yes" rissponse on lines 1a through 1) belons, provide in Part IV a detailed description of the lobbying virty.	(a) No
The representation of include connected at the new particle on times are through 11)? The regulations of the public? But of publishing or briesdeast statements? The regulations on threadeast statements? The regulations on threadeast statements? The regulations on the public of the second of the second of the second sold of the second of the seco	Danng tile year, did the filing organization attempt to influence foreign, national, atate or local. legislation, including any attempt to influence public opinion on a legislative metter or referendum; through the use of	
The regulations, of the public? The regulations of britishing purposes? The regulations of britishing purposes? The regulations, the regulations are settled by the settled by the settled budge of the settled bu	integra?	
energy: for "ingulations, or the public? for "ingulations or breadcast statements" bits organizations, sammats, conventioning purposes? cut much ingulations, sammats, conventioning purposes? cut much is publications, sammats, conventioning and executed in section 501(c)(3)? cut much 1 cause the organization is exempt under section 501(c)(3)? for the amount of any bax incursed substances and the factoring of the true section 501(c)(4)? for the amount of any bax incursed substances are exempt under section 501(c)(4); section 501(c)(5), or section 501(c)(6). for the organization is exempt under section 501(c)(4); section 501(c)(5); or section 501(c)(6); section 50	Paid staff or management (include compensation in expenses reported on lines 110 through 11)?	
eth, legalisters, or the public? Act organizations for ideological parties and the control of t	is adverticamente?	
The complete to care againstancing of the public? Control of the published of the detects trades, givenimate thicking, are a largestand to care againstancing of the published of the detects trades, givenimate thicking, are always as a largestancing to care againstancing, seminar, conventions, speeches, lectures, or any similar means? Additionary (1)		
Transe to eacher organization of breedcaststatements? JURIC Complete of the inspiration, their staffs, giveniment efficiels, or a lappilatorial body? STATES, define the formatistation, demnists, conventions, specifies, lectures, or any similar ments? STATES, demonstration, demnists, conventions, specifies, lectures, or any similar ments? And these is through 11. The Structures in the Tobias of the regardization for end described in section SQL(C)(3)? The Structures in the Tobias of the regardization for end described in section SQL(C)(4), section SQL(C)(5), or section SQL(C)(6) and the staff of the regardization is exempt under section SQL(C)(4), section SQL(C)(5), or section SQL(C)(6) and it fellows to receive a tracerve of more described by instructions again as control or second transfer and section SQL(C)(4), section SQL(C)(5), or section SQL(C)(6) and it fellows to second transfer a section SQL(C)(4), section SQL(C)(5), or section SQL(C)(6) and it fellows to second transfer a section SQL(C)(6),	ings to members, legislators, or the public?	
Tractic to achie deginitations for laboying purposes? Control		I
CECTORIES with legislation, their stalls, give entminst efficials, or a legislatore bold? CECTORIES of through 1. And increase the copy of the control of the control of the control of the copy of	Grants to other organizations for lobbying purposes?	I
strivings? Interest Actions to the comparation in precise, lections, or any similar manns? Actions in the activities in the 1 cause the apparation in the not described in section Sol(c)(3)? Actions in the activities in the 1 cause the apparation in the not described in section Sol(c)(3)? Actions in the activities in the 1 cause the apparation in the notation of the section Sol(c)(4); section Sol(c)(6), or section from the section Sol(c)(4); section Sol(c)(6), or section from the activities in the action in the activities of the action section section Sol(c)(4); section Sol(c)(6), or section Sol(c)(6), or section section section Sol(c)(6); or section sol(c)(6); or section section section section section Sol(c)(6); or section section section section section section Sol(c)(6); or section section section section Sol(c)(6); or section sectio		
Add these is through it. The Activities in the Table the organization in the end described in section SOI(CNI)? The Activities in the Table the organization in the end described in section SOI(CNI)? The filtre animal of any is inscribed under section 4930 thrittles were section 501(CNI) in section 501(CNI). The filtre organization incurred a section 4912 to, and of the Form 4930 thrittles year? SOI(CNI) SOI(CNI) The complete if the organization is exempt under section SOI(CNI) is section SOI(CNI). The complete if the organization is seempt under section SOI(CNI) is section SOI(CNI). SOI(CNI) SOI(CNI		1 1
Add time is through 1. The describes in the 1 cause the organization is be not described in section \$0.1(c)(3)? The filtre filtre describes in the 1 cause the organization is exempt under section \$0.1(c)(4); section \$0.1(c)(5), or section \$0.1(c)(4); section \$0.1(c)(4); section \$0.1(c)(6); or se	er activities?	
And times to through 11. The activities an incurred to engandation to be not described in section \$0.0 (c)(3)? The set settle the amount of any tax incurred by organization managers under section \$0.1 (c)(4); section \$0.1 (c)(5), or section \$0.1 (c)(6); or section \$0.		
Interesting the activation in the 1 cause, the ingentiation to be not described in section 501(c)(1)? If "Year," enter the amount of any tax incurred under section 4912 If "Year," enter the amount of any tax incurred under section 4912 If "Year," enter the amount of any tax incurred under section 4912 SO1(c)(6) Interesting the incurred and the parameter of the form 4720 for this year? SO1(c)(6) Interesting the complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6). Interesting and the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6). Interesting and the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6). Interesting and the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6). Interesting and the organization is exempt under section 501(c)(6), section 501(c)(5), or section 501(c)(6). Interesting and the exemption of either (a) BOTH Part IIIA, lines 1 and 2, are answered "No" OR (b) Part III. Section 15 (c) and if either (a) BOTH Part IIIA, lines 2 and 2, are answered "No" OR (b) Part III. Interesting and the exemption of either (a) and political expenditures (do not include anounts of political and the exemption of the reasonable estimate of nondeductible lobbyring and political expenditures (see matricions). Sologics required to section 6013(e)(1)(4), notices of nondeductible lobbyring and political expenditures (see matricions) and set it. B, in a 1 Also, complete the part back year. Explaination of bothyring and political expenditures (see matricions) and set it. B, in a 1 Also, complete the part backyring and information of set it. B, in a 1 Also, complete the part backyring and information of set it. B, in a 1 Also, complete the part backyring and information of set it. B, in a 1 Also, complete the setting backering and information of setting the exercise of setting the setting of setting the setting backering the setting of sett	il Add lines 1¢ through 1)	
The finer interitie amount of any lax incurred by organization managers under section 501(c)(4), section 501(c)(5), or section 501(c)(6), or section 501(c)(6), section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), section 501(c)(6), section 501(c)(6), section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), or section 501(c)(6), section 501(c)(6), section 501(c)(6), or section 501(c)(6), sect	Dut the activities in line 1 cause the organization to be not described in section 501(c)(1)? If "Pes," enter the amount of any lax incured under section 4912	1
The fining impanization incurred a section 4912 tax, did of the Form 4720 (br.this year) ILEA Complete if the organization is exempt under section SOL(c)(4), section SOL(c)(5), or section SOL(c)(6). Vere substantially all (90% or more) dues received inordeductible by memberis? 1 Vere source of section SOL(c)(6) and it elements to organization make only in-house lobying expenditures of \$2,000 or less? 2 2	If "Vas," enter the amount of any tax incurred by organization managers under section 4912.	
Here substantially all (50% or more) dues received inordeductible by members? Year substantially all (50% or more) dues received inordeductible by members? X Year 10	If the filing organization incurred a section 4912 tax, did if file form 4720 for this year?	
Vere substantially all (90% or more) dues received prondeductible by inemberis? 10 the organization make only in-house lobbying expenditure of \$2,400 or less? 11		501(c)(5), or section
Title Complete if the organization is exempt under section SOI(C)(4), section SOI(C)(5), or section SOI(C)(5) and if either (2) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Part III	Were substantially all (90% or more) dues received nondeductible by members?	
Section 301(C)(5) and if either (a) BOTH Part IIIA, lines 1 and 2, are answered "No" OR (b) Part III	Did the organization make only in-house lobbying expenditures of \$2,000 or less?	2 No
SOLO(6) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Part III	Did the organization agree to carry over lobbying and political expenditures from the prior year?	3 No
Security and similar amounts from members 648,612 648,612 Section 152(e) nondeductible lebsying and pointed expenditures (do not include amounts of political 100,000 200,000 200,000 200,000 200,000 Section 527(1) tax was paid). 1 year 200,000		SOI(c)(5), or section 'No" OR (b) Part III-A,
Sel_B_B_I_2 Sel_B_B_I_2 Sel_B_B_I_2 Section 152(e) innedeductible lobbying and political expenditures (do not include amounts of political A year Sel_B_B_I_2 Sel_B_B_I_2 Sel_B_B_B_B_B_B_B_B_B_B_B_B_B_B_B_B_B_B_B	s, assessments and similar amounts from members	
200,000 200,000 200,000 200,000 200,000 Agregate amount caported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues 13 13 15 Taxable amount of the exersover to the reasonable estimate of nondeductible lobbying and secentariate to the reasonable estimate of nondeductible lobbying and the amount of lobbying and section to the reasonable estimate of nondeductible lobbying and the section of the exersover to the reasonable estimate of nondeductible lobbying and the acceptance of the exersover to the reasonable estimate of nondeductible lobbying and the section of the exersor to the reasonable estimate (see instructions) EXI Supplemental Information Explanation Explanation Explanation Explanation Explanation Explanation Explanation	648,512 Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 522(f) tax was paid).	
200,000 200,000 Sopregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues. Samount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues. It is no repaired to amount on the 2 carreage the amount on the 3, what portion of the excess is no repaired to a second to the reasonable estimate of nondeductible loabyring and a second to the reasonable estimate of nondeductible loabyring and at the descriptions required for Part LA, line 3, Part LB, line 4, Part LB, line 4, Part LB, line 5, Part LB, line 5, Part LB, line 5, Part LB, line 5, Part LB, line 6, Part LB, line 6, Part LB, line 7, Part LB, line 8, Part LB, line 8	ent year	
200,000 200,000 200,000 200,000 200,000 200,000 Se were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess less mount of lobbying and se amount of lobbying and se amount of lobbying and political expenditures (see instructions) (IV Supplemental Information as the descriptions required (by Part L-A, line 3, Part L-C, line 5, Part II-A, lines and the descriptions required (by Part L-A, line 3, Part L-C, line 5, Part II-A, lines 4, Part II-A, lines 4, Part II-A, lines 5, Part II-A, lines 5, Part II-A, lines 5, Part II-A, lines 5, Part II-A, lines 6, Part II-	Ĭ	
\$00,000 \$00,000 \$00,000 \$00,000 \$00,000 \$0.000 \$	yover from last year	
\$00,000 Aggregate amount exported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues The same sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess It is ungainfailed any agree to cerrivore to the reasonable estimate of nondeductible lobbying and Expenditure next year? The same sent and pointed by products are predictives (see instructions) Exp. Supplemental Information Agturn Reference Explanation Agturn Reference Explanation Agturn Reference Explanation		
S S S S S S S S S S		
It is a ware sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess. It is urganization spice to cerry eyer to the reasonable extimate of nondedectible lobbying and Taxable amount of lobbying and political expenditures (see instructions). Supplemental Information Supplemental Information See manufactors, part 1-8, line 4, Part 1-8, line 4, Part 1-C, line 5, Part II-A (affiliated group list), Fart II-A, lines 1 and Require descriptions required for Part 1-A, line 1, Part 1-B, line 4, Part 1-C, line 5, Part II-A (affiliated group list), Fart II-A, lines 1 and Require descriptions required for part 1-B, lines 2, Part 1-B, lines 3 Part II-A (affiliated group list), Fart II-A, lines 1 and Require 6 Absence Taxable amount of lobbying and political grower part by a part	300,000 Aggregate amount reported in section 6033(e)(1,1(A) notices of nondeductible section 162(e) dues	
Taxable amount of lobbying and political expenditures (see instructions) arety Supplemental Information violating and proper in A. Jine 1, Part i-B, line 4, Part i-C, line 5, Part II-A (affiliated group list), Fart II-A, linus 1 and see instructions; and order of part in Also, complete this part has avoid additional information Requires Reference Requires Reference TA, Line 1 - Direct and Indirect Influencing government policies affecting Chloroflourocarbons	once were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess the organization agree to carryover to the reasonable estimate of nondeductible lobbyring and contexture next year?	
Taxable amount of lobbying and pointial expenditures (see instructions) art.V. Supplemental Information violatific Supplemental Information violatific Supplemental Information see instructions, and Partitile, line 1. Also, complete this part in brany additional information Returns Reference Returns Reference Taylour 1 Direct and Information Superiment policies affecting Chloroflourocarbons		
TATE IN Supplemental Information Voted the descriptions required (to Part I-A, Jine 1, Part I-B, Jine 4, Part I-C, Jine 5, Part II-A (affiliated group list), Part II-A, linus 1 and see matricions), and Part II-B, Jine 1 Also, complete this part for any additional information Requires Reference Requires Reference [T.A, L.me 1 - Direct and Indured Influencing government publicies affecting Chloroflourocanbons	Taxable amount of lobbying and political expenditures (see instructions).	2
See instructions), and Part II-8, line 1. Also, complete this part for any additional information Rejum Reference Explanation Explanation Explanation I.A. Line 1 Direct and Indirect Influencing government policies affecting Chloroflourocarbons	Supplemental Information Supplemental Information Supplemental Information	Up list), Fart II-A, links 1 and
_	see instructions), and Part II-B, line 1. Also, complete this part for any additional information. Return Refusence	

efile GRAPHIC print - DO NOT PROCESS | As Filed Data -

DLN: 93493215007796

OMB No 1545-0047

SCHEDULE D

Department of the Treasury

Internal Revenue Service

P

(Form 990)

Supplemental Financial Statements

► Complete if the organization answered "Yes," on Form 990, Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b.
► Attach to Form 990.

Information about Schedule D (Form 990) and its instructions is at www.irs.gov/form990.

Open to Public Inspection

	me of the organization IANCE FOR RESPONSIBLE ATMOSPHERIC		Emp	loyer identification number
	ICY INC		52-	1207922
a	Organizations Maintaining Donor Complete if the organization answer	r Advised Funds or Other Similar ed "Yes" on Form 990, Part IV, line 6.	Funds	or Accounts.
		(a) Donor advised funds	100,000	Funds and other accounts
	Total number at end of year		1	
	Aggregate value of contributions to (during year)			
	Aggregate value of grants from (during year)	1		
	Aggregate value at end of year			
	Did the organization inform all donors and donor funds are the organization's property, subject to		onor advi	sed Yes No
	Did the organization inform all grantees, donors, used only for charitable purposes and not for the conferring impermissible private benefit?			
i	rt III Conservation Easements. Comple	ete if the organization answered "Yes"	on Form	n 990, Part IV, line 7.
	Purpose(s) of conservation easements held by the Preservation of land for public use (e.g., recreed Protection of natural habitat Preservation of open space Complete lines 2a through 2d if the organization	Preservation of a Preservation of a	a certifie	cally important land area d historic structure
	easement on the last day of the tax year	mora a qualifica conservation constitution in		TOTAL CONSCIVENCEN
				Held at the End of the Year
	Total number of conservation easements		2a	
	Total acreage restricted by conservation easeme	ents	2b	1
	Number of conservation easements on a certified	historic structure included in (a)	2c	III I
	Number of conservation easements included in (historic structure listed in the National Register		2d	
	Number of conservation easements modified, tra	nsferred, released, extinguished, or termina	ited by th	e organization during the
	tax year ►			
	Number of states where property subject to cons	ervation easement is located 🛌		
	Does the organization have a written policy regain violations, and enforcement of the conservation of		indling of	☐Yes ☐ No
	Staff and volunteer hours devoted to monitoring, year	inspecting, handling of violations, and enfor	cing con	servation easements during the
	·			
	A mount of expenses incurred in monitoring, insp	ecting, handling of violations, and enforcing	conserv	ation easements during the year
	Does each conservation easement reported on li (B)(i) and section 170(h)(4)(B)(ii)?	ne 2(d) above satisfy the requirements of s	ection 17	70(h)(4) Yes No
	In Part XIII, describe how the organization report balance sheet, and include, if applicable, the text the organization's accounting for conservation ea	of the footnote to the organization's financi		
r	t III Organizations Maintaining Collect	ctions of Art, Historical Treasures ed "Yes" on Form 990, Part IV, line 8.	, or Otl	ner Similar Assets.
ī	If the organization elected, as permitted under S works of art, historical treasures, or other similar service, provide, in Part XIII, the text of the foot	FAS 116 (ASC 958), not to report in its rev rassets held for public exhibition, education	n, or rese	arch in furtherance of public
	If the organization elected, as permitted under S works of art, historical treasures, or other similar service, provide the following amounts relating to	assets held for public exhibition, education		
(i) Revenue included on Form 990, Part VIII, line	1	* \$	
	i) Assets included in Form 990, Part X		* \$	
	If the organization received or held works of art, following amounts required to be reported under s			cial gain, provide the
	Revenue included on Form 990, Part VIII, line 1			* \$
i	Assets included in Form 990, Part X			F 4

3	(continued)								
	Using the organization's acquisition, acce collection items (check all that apply)	ssion, and other records,	check	any of the fo	ollowing that a	re a significai	nt use of	its	
a	Public exhibition	d		Loan or ex	change progra	ams			
b	Scholarly research	e	F	Other					
C	Preservation for future generations								
į.	Provide a description of the organization's Part XIII	s collections and explain h	ow the	further the	organization'	s exempt pur	pose in		
5	During the year, did the organization solic						No.		
	assets to be sold to raise funds rather tha	The state of the s	t of the	organizatio	n's collection	2	Yes	No	
'a i	Complete if the organization a Part X, line 21.		n 990,	Part IV, l	ne 9, or rep	orted an an	nount o	n Form	990,
la	Is the organization an agent, trustee, cus included on Form 990, Part X?	todian or other intermedia	ry for c	ontributions	s or other asse		Yes	No	
b	If "Yes," explain the arrangement in Pa	rt XIII and complete the i	followin	g table			Amoun	t	
c	Beginning balance			7	1c		111		
d	Additions during the year				1d				
e	Distributions during the year				1e				
f	Ending balance				1f				
a	Did the organization include an amount or	Form 990 Part V line 21	fores	crow or cus		t liability2 [Voc 1	No	
		1 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 -	1000	200	200000 000000	Several New York		7.22	
b	If "Yes," explain the arrangement in Part	XIII Check here if the ex	planatio	n has been	provided in P	art XIII			Г
Pa	rt V Endowment Funds. Complet								
		(a)Current year (b)	Pnor yea	b (c)T	wo years back	(d)Three years I	back (e)	Four year	ars back
a	Beginning of year balance								
ь	Contributions								
c	Net investment earnings, gains, and losses								
d	Grants or scholarships						_		
e	Other expenditures for facilities and programs								
f	Administrative expenses								
a	End of year balance								
١	Provide the estimated percentage of the o	urrent year end halance (line In	column (a)) held as				
	Board designated or guasi-endowment	arrene year end barance (inc 1g	corainii (a)	711010.00				
2									
a									
ь	Permanent endowment 🗠								
b c	Permanent endowment ► Temporarily restricted endowment ► The percentages on lines 2a, 2b, and 2c s		52.0	an Luidhean	(Eximation	Karks			
b c	Permanent endowment F Temporarily restricted endowment F The percentages on lines 2a, 2b, and 2c s Are there endowment funds not in the pos		n that a	are held and	l administered	for the		Yes	No
b c	Permanent endowment ► Temporarily restricted endowment ► The percentages on lines 2a, 2b, and 2c s		n that a	are held and	administered	for the	3a(i)	Yes	No
b c	Permanent endowment F Temporarily restricted endowment F The percentages on lines 2a, 2b, and 2c s Are there endowment funds not in the posorganization by (i) unrelated organizations	session of the organizatio			administered	for the	3a(i) 3a(ii)	Yes	No
b c	Permanent endowment F Temporarily restricted endowment F The percentages on lines 2a, 2b, and 2c s Are there endowment funds not in the posoganization by (i) unrelated organizations	session of the organizatio	 n Sched	iule R?	l administered	for the	-	Yes	No
b c a	Permanent endowment F Temporarily restricted endowment F The percentages on lines 2a, 2b, and 2c s Are there endowment funds not in the posorganization by (i) unrelated organizations (ii) related organizations If "Yes" on 3a(ii), are the related organizations of the posorganization of the posorganizations of th	session of the organizatio	 n Sched	iule R?	administered	for the	3a(ii)	Yes	No
b c a	Permanent endowment F Temporarily restricted endowment F The percentages on lines 2a, 2b, and 2c s Are there endowment funds not in the posing organization by (i) unrelated organizations	session of the organization strong listed as required or f the organization's endownent.	n Scheo	dule R?			3a(ii) 3b		No
b c a	Permanent endowment F Temporarily restricted endowment F The percentages on lines 2a, 2b, and 2c s Are there endowment funds not in the posorganization by (i) unrelated organizations (ii) related organizations If "Yes" on 3a(ii), are the related organizations of the posorganization of the posorganizations of th	session of the organization is listed as required or f the organization's endowment. nswered 'Yes' to Form	n Scheo ment fi	dule R?	e 11a.See F	orm 990, Pa	3a(ii) 3b art X, lin	ne 10.	
b c a b	Permanent endowment F Temporarily restricted endowment F The percentages on lines 2a, 2b, and 2c s Are there endowment funds not in the posing organization by (i) unrelated organizations	session of the organization is listed as required or f the organization's endowment. nswered 'Yes' to Form	n Scheo ment fi	dule R? unds Part IV, lin or other basis	e 11a.See F (b) Cost or other ba	orm 990, Pa	3a(ii) 3b art X, lin	ne 10.	
b c a b	Permanent endowment F Temporarily restricted endowment F The percentages on lines 2a, 2b, and 2c s Are there endowment funds not in the posorganization by (i) unrelated organizations	session of the organization is listed as required or f the organization's endowment. nswered 'Yes' to Form	n Scheo ment fi	dule R? unds Part IV, lin or other basis	e 11a.See F (b) Cost or other ba	orm 990, Pa	3a(ii) 3b art X, lin	ne 10.	
b c a b	Permanent endowment F Temporarily restricted endowment F The percentages on lines 2a, 2b, and 2c s Are there endowment funds not in the posing organization by (i) unrelated organizations	session of the organization is listed as required or f the organization's endowment. nswered 'Yes' to Form	n Scheo ment fi	dule R? unds Part IV, lin or other basis	e 11a.See F (b) Cost or other ba	orm 990, Pa	3a(ii) 3b art X, lin	ne 10.	
b c a b c a b c	Permanent endowment F Temporarily restricted endowment F The percentages on lines 2a, 2b, and 2c s Are there endowment funds not in the posing organization by (i) unrelated organizations	session of the organization is listed as required or f the organization's endowment. nswered 'Yes' to Form	n Scheo ment fi	dule R? unds Part IV, lin or other basis	e 11a.See F (b) Cost or other ba	orm 990, Pa	3a(ii) 3b art X, lin	ne 10.	No ok value

Part VII Investments—Other Securities. Comp See Form 990, Part X, line 12.	plete if the organiza	ition answered Ye	es' on Form 990, Part IV, line 11t
(a) Description of security or category (including name of security)		(b)Book value	(c)Method of valuation Cost or end-of-year market valu
L)Financial denvatives			Terror and or year manage varia
Closely-held equity interests			
3)Other			
tal. (Column (b) must equal Form 990, Part X, col (B) line 12)	C(*)		
Investments—Program Related. Complete if the organization answered '	es' on Form 990 F	art IV line 11c -	5 - 186 F II L
(a) Description of investment	163 01110(111330,1	(b) Book value	(c) Method of valuation
127 Seathfrain S. M. Seathfrain		(a) pass raine	Cost or end-of-year market valu
			1
			+
			11,-1
			- 4 1
Part X Other Liabilities. Complete if the organ			
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25.			
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability	ization answered 'Y		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability	ization answered 'Y		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability	ization answered 'Y		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability	(b) Book value		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability	(b) Book value		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability	(b) Book value		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability	(b) Book value		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability	(b) Book value		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability ederal income taxes	(b) Book value		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability ederal income taxes	(b) Book value		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability ederal income taxes	(b) Book value		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability ederal income taxes	(b) Book value		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability ederal income taxes	(b) Book value		
	(b) Book value		
Part X Other Liabilities. Complete if the organ See Form 990, Part X, line 25. (a) Description of liability	(b) Book value		

Schedule D (Form 990) 2015

Part XIII Supplemental Information (continued)	ormation (continued)	
Return Reference	Explanation	

efile GRAPHIC print - DO NOT PROCESS | As Filed Data -

DLN: 93493215007796

Schedule L

(Form 990 or 990-EZ)

Transactions with Interested Persons

Complete if the organization answered "Yes" on Form 990, Part IV, lines 25a, 25b, 26, 27, 28a, 28b, or 28c, or Form 990-EZ, Part V, line 38a or 40b.

OMB No 1545-0047

Department of the Treasu		▶Informatio		dule L (For	m 990 or Form 99 m 990 or 990-EZ gov/form990.		ctions	is at		Ope	n to Pi specti	ublic on
Name of the o ALLIANCE FOR RE POLICY INC		OSPHERIC					11/28		r identi 7922	fication	n number	
					section 501(c) 0, Part IV, line						40h	
	me of disquali				etween disquali) Des	cription		(d) Corr	ected?
					organization			tran	saction		Yes	No
							-					
							-					
					disqualified pers			- 7.				
Part II L	oans to and	i/or From I	nterested swered "Yes	Persons on Form 9	the organization. 990-EZ, Part V, line 5, 6, or 22					e 26, c	or if the	
(a) Name of interested person	(b) Relation with organizati	Purpose	(d) Loan or from th organization	ie	(e)Original principal amount	(f)Balance due	(g) defa		Appro by boa	ved rd or	(i)Wri agreen	
			To	From			Yes	No	Yes	No	Yes	No
				Ti .								
												-
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				1								
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Total Part III Gr	ants or As	▶ \$ sistance Be	nefiting In	terested	Persons.		-					
				_	Form 990, Pa				12.3	Ré-Zei	218210	
(a) Name of pers		(b) Relations interested pe organi	rson and the	(c) A mot	int of assistanc	e (d) Type o	ir assi	stance	(e)	Purpos	e of ass	istance
									-			
									17			
									- I			
									7			
		-				_						

(a) Name of interested person		Complete if the organization answered "Yes" on Form 990, Part IV, line 28a, 28b, or 28c.	e 28a, 28b, or 28c.		
	(b) Relationship between interested person and the organization	(c) A mount of transaction	(d) Description of transaction	(e) Sharing of organization's revenues?	ation's
(1) Alcalde & Fay	Director	557,201	Lobbying & Mgt		o Z
				Ĺ	
				M	

Schedule L (Form 990 or 990-EZ) 2015

Explanation

Provide additional information for responses to questions on Schedule L (see instructions)

Return Reference

efile GRAPHIC print - DO N	rint - DO NOT PROCESS As Filed Data -	DLN: 9	DLN: 93493215007796
CCUEDIII E O	Supplemental Information to Form 990 or 990-E7	m 990 or 990 E7	OMB No 1545-0047
SCHEDULE O		111 330 OI 330-L4	(
(Form 990 or 990-EZ)			204 F
	Complete to provide information for responses to specific questions on	o specific questions on	0 07
T colt to the section of	Form 990 or 990-EZ or to provide any additional information.	ional information.)
Department of the Heasury	► Attach to Form 990 or 990-EZ	-67.	Open to Public
Internal Revenue Service	F Information about Schedule O (Formula 990 or 990-57) and its instructions is at	7) and its instructions is at	Inspection

Employer identification number	52-1207922
ne organization DR RESPONSIBLE ATMOSPHERIC	
	Name of the organization ALIANCE FOR RESPONSIBLE ATMOSPHERIC

990 Schedule O, Supplemental Information	
Return Reference	Explanation
Form 990, Part V, Line 3b Reason For Not Filing Form 990-T	The \$159,701 of Other Income is an insurance reimbursment for an embezzlement claim
Form 990, Part VI, Line 3 Description of Delegated Duties to Management Company	Day-to-Day Operations directed by management company
Form 990, Part VI, Line 11b Form 990 Review Process	No review was or will be conducted
Form 990, Part VI, Line 19 Other Organization Documents Publicly Available	No documents available to the public

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Do not enter social security numbers on this form as it may be made public ▶ Information about Form 990 and its instructions is at www IRS gov/form990

¥ Yes ☐ No

Cat No 11282Y

Form 990 (2016)

Open to Public Inspection

OMB No 1545-0047

Department of the Treasur Internal Revenue Service

A For the 2016 calendar year, or tax year beginning 01-01-2016 , and ending 12-31-2016 C Name of organization ALLIANCE FOR RESPONSIBLE ATMOSPHERIC D Employer identification number B Check if applicable ☐ Address change POLICY INC 52-1207922 ☐ Name change Doing business as ☐ Initial return Deturn/terminated E Telephone number Number and street (or P O box if mail is not delivered to street address) Room/suite 2111 WILSON BOULEVARD Amended return (703) 243-0344 ☐ Application pending City or town, state or province, country, and ZIP or foreign postal code ARLINGTON, VA 22201 G Gross receipts \$ 566,349 F Name and address of principal officer H(a) Is this a group return for Dyes VNo subordinates? 2111 Wilson Blvd H(b) Are all subordinates Arlington, VA 22201 Yes VNO included? Tax-exempt status 501(c)(3) 501(c) (6) (insert no) 4947(a)(1) or 527 If "No," attach a list (see instructions) H(c) Group exemption number ▶ J Website: ► www arap org L Year of formation 1994 M State of legal domicile VA K Form of organization

✓ Corporation

Trust

Association

Other Part I Summary 1 Briefly describe the organization's mission or most significant activities Activities & Governance 2 Check this box ▶ ☐ if the organization discontinued its operations or disposed of more than 25% of its net assets 28 3 Number of voting members of the governing body (Part VI, line 1a) 3 4 Number of independent voting members of the governing body (Part VI, line 1b) 4 28 5 0 5 Total number of individuals employed in calendar year 2016 (Part V, line 2a) 6 7a Total unrelated business revenue from Part VIII, column (C), line 12 . 7a 0 b Net unrelated business taxable income from Form 990-T, line 34 7b **Current Year** 8 Contributions and grants (Part VIII, line 1h) . . 0 Ravenue 648,612 9 Program service revenue (Part VIII, line 2g) . 656,190 10 Investment income (Part VIII, column (A), lines 3, 4, and 7d) . 177 159 11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e) 159,701 Ò 808,490 666,349 12 Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12) 13 Grants and similar amounts paid (Part IX, column (A), lines 1-3) . . . Ò 14 Benefits paid to or for members (Part IX, column (A), line 4) 0 0 15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10) Expenses 16a Professional fundraising fees (Part IX, column (A), line 11e) 0 b Total fundraising expenses (Part IX, column (D), line 25) ▶0 17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e) 706,466 698,143 18 Total expenses Add lines 13-17 (must equal Part IX, column (A), line 25) 706,466 698,143 19 Revenue less expenses Subtract line 18 from line 12 . . . 102,024 -31,794 Assets or d Balances Beginning of Current Year 587,583 20 Total assets (Part X, line 16) . 479,872 21 Total liabilities (Part X, line 26) 52,155 191,660 395,923 22 Net assets or fund balances Subtract line 21 from line 20 . 427,717 Part III Signature Block Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge 2017-08-21 Signature of officer Sign Here Kevin Fay Executive Director Type or print name and title Preparer's signature Douglas J Alcorn CPA Print/Type preparer's name Douglas J Alcorn CPA Date PTIN Check | if P00000476 Paid self-employed Firm's EIN Firm's name ALCORN & CURETON Ltd CPAs Preparer Firm's address > 4604 B Pinecrest Office Pk Dr Phone no (703) 354-7750 Use Only Add. 91 Alexandria, VA 22312

May the IRS discuss this return with the preparer shown above? (see instructions) .

For Paperwork Reduction Act Notice, see the separate instructions.

Par	Checklist of Required Schedules		Yes	No
1	Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A	1		No
2	Is the organization required to complete Schedule B, Schedule of Contributors (see instructions)?	2		No
3	Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I 2	3		No
4	Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II	4		No
5	Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III	5	Yes	
6	Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I $\$	6		No
7	Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II 🐿	7		No
8	Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III **	8		No
9	Did the organization report an amount in Part X, line 21 for escrow or custodial account liability, serve as a custodian for amounts not listed in Part X, or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV	9		No
10	Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi-endowments? If "Yes," complete Schedule D, Part V	10		No
11	If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VIII, VIII, IX, or X as applicable			
а	Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI	11a		No
b	Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII	11b		No
c	Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII	11c		No
d	Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX 2	11d		No
e	Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X 🕏	11e	Yes	
f	Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X 🕏	11f		No
12a	Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII **	12a		No
b	Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional	12b		No
13	Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13		No
14a	Did the organization maintain an office, employees, or agents outside of the United States?	14a		No
b	Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV	14b		No
15	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV	15		No
16	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16		No
17	Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I (see instructions)	17		No
18	Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II	18		No
19	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III	19		No

Par	IV Checklist of Required Schedules (continued)			
			Yes	No
	Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H	20a		No
b	If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?	20Ь		
21	Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 17 If "Yes," complete Schedule I, Parts I and II	21		No
22	Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III	22		No
23	Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? If "Yes," complete Schedule J	23		No
24a	Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a	24a		No
b	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?	24b		No
c	Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds?	24c		No
d	Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?	24d		No
25a	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year? If "Yes," complete Schedule L, Part I	25a		No
b	Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part I	25b		No
26	Did the organization report any amount on Part X, line 5, 6, or 22 for receivables from or payables to any current or former officers, directors, trustees, key employees, highest compensated employees, or disqualified persons? If "Yes," complete Schedule L, Part II	26		No
27	Did the organization provide a grant or other assistance to an officer, director, trustee, key employee, substantial contributor or employee thereof, a grant selection committee member, or to a 35% controlled entity or family member of any of these persons? If "Yes," complete Schedule L, Part III	27		No
28	Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions)			
а	A current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part IV	28a		No
b	A family member of a current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part	28b	=	No
c	An entity of which a current or former officer, director, trustee, or key employee (or a family member thereof) was an officer, director, trustee, or direct or indirect owner? If "Yes," complete Schedule L, Part IV	28c	Yes	
29	Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule M .	29		No
30	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? If "Yes," complete Schedule M	30		No
31	Did the organization liquidate, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, Part I	31		No
32	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete Schedule N, Part II	32		No
33	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301 7701-2 and 301 7701-37 If "Yes," complete Schedule R, Part I	33		No
34	Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1	34		No
35a	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	35a		No
b	If 'Yes' to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2	35b		No
36	Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? If "Yes," complete Schedule R, Part V, line 2	36		No
37	Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI	37		No
38	Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and 197 Note. All Form 990 filers are required to complete Schedule O	38		No

Form	990 (2016)			Page :
Pai	Statements Regarding Other IRS Filings and Tax Compliance			П
-	Check if Schedule O contains a response or note to any line in this Part V	-	Yes	No
1a	Enter the number reported in Box 3 of Form 1096 Enter -0- if not applicable 1a 1		100	110
b	Enter the number of Forms W-2G included in line 1a Enter -0- if not applicable 1b 0			
c	Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming (gambling) winnings to prize winners?	1c	Yes	
2a	Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return			
b	If at least one is reported on line 2a, did the organization file all required federal employment tax returns? Note.If the sum of lines 1a and 2a is greater than 250, you may be required to e-file (see instructions)	2b		No
3a	Did the organization have unrelated business gross income of \$1,000 or more during the year?	3a		No
ь	If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation in Schedule O	3b		No
4a	At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)?	4a		No
b	If "Yes," enter the name of the foreign country See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR)			
5a	Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?	5a		No
b	Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?	5b		No
c	If "Yes," to line 5a or 5b, did the organization file Form 8886-T2	- 5		
6a	Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization	5c 6a	Yes	
b	solicit any contributions that were not tax deductible as charitable contributions? If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible?	6b	Yes	
7	Organizations that may receive deductible contributions under section 170(c).	0.0	103	
	Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor?	7a		
b	If "Yes," did the organization notify the donor of the value of the goods or services provided?	7b		
	Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Form 8282?	7c		
d	If "Yes," indicate the number of Forms 8282 filed during the year			
e	Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	7e		
f	Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?	7f		
g	If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required?	7g		
h	If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C?	7h		
8	Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year?	8		No
93	Did the sponsoring organization make any taxable distributions under section 4966?	9a		No
	Did the sponsoring organization make a distribution to a donor, donor advisor, or related person?	9b		No
10	Section 501(c)(7) organizations. Enter			1,10
a	Initiation fees and capital contributions included on Part VIII, line 12			
b	Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities 10b			
11	Section 501(c)(12) organizations. Enter			
а	Gross income from members or shareholders			
b	Gross income from other sources (Do not net amounts due or paid to other sources against amounts due or received from them)			
12a	Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041?	12a		No
	If "Yes," enter the amount of tax-exempt interest received or accrued during the year			
13	Section 501(c)(29) qualified nonprofit health insurance issuers.			
а	Is the organization licensed to issue qualified health plans in more than one state? Note. See the instructions for additional information the organization must report on Schedule O	13a		No
ь	Enter the amount of reserves the organization is required to maintain by the states in			

 ${f b}$ If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O .

13b

13c

No

14a

14b

Par	t VI	Governance, Management, and DisclosureFor each "Yes" response to lines 2 8a, 8b, or 10b below, describe the circumstances, processes, or changes in School			" respo	nse to l	ines
		Check if Schedule O contains a response or note to any line in this Part VI					~
Se	ction	A. Governing Body and Management					
			r - 2			Yes	No
1a	Enter	the number of voting members of the governing body at the end of the tax year	1a	28	-	-	-
	16 tho	ere are material differences in voting rights among members of the governing	3.0				
	body,	or if the governing body delegated broad authority to an executive committee or					
		ar committee, explain in Schedule O					
b	Enter	the number of voting members included in line 1a, above, who are independent	1b	28			
2	Did a	ny officer, director, trustee, or key employee have a family relationship or a busine r, director, trustee, or key employee?	ss relat	ionship with any other	2		No
3	Did th	ne organization delegate control over management duties customarily performed by icers, directors or trustees, or key employees to a management company or other	y or un	der the direct supervision	-	Yes	11
4		ne organization make any significant changes to its governing documents since the					
-			1		4		No
5	Did th	ne organization become aware during the year of a significant diversion of the orga	nization	's assets? .	5		No
6	Did th	ne organization have members or stockholders?		0 f Y 1 F	6		No
7a		ne organization have members, stockholders, or other persons who had the power bers of the governing body?			7a		No
b	Are a	ny governance decisions of the organization reserved to (or subject to approval by one other than the governing body?	memb	ers, stockholders, or	7b		No
8	Did th	ne organization contemporaneously document the meetings held or written actions ollowing					
a	The g	overning body?			8a	Yes	-
		committee with authority to act on behalf of the governing body?			8b		No
	Is the	ere any officer, director, trustee, or key employee listed in Part VII, Section A, who inzation's mailing address? If "Yes," provide the names and addresses in Schedule 0	cannot	be reached at the	9	Yes	
Se		B. Policies (This Section B requests information about policies not requ			e Code	e.)	
						Yes	No
10a	Did th	ne organization have local chapters, branches, or affiliates?	Gr. co	e + 3 **	10a		No
b		es," did the organization have written policies and procedures governing the activition and the constant of th			10b		1
11a		he organization provided a complete copy of this Form 990 to all members of its go			11a	Yes	
b	Descr	ribe in Schedule O the process, if any, used by the organization to review this Form	990	to be a second			11
12a	Did th	ne organization have a written conflict of interest policy? If "No," go to line 13 .			12a	Yes	
ь	Were	officers, directors, or trustees, and key employees required to disclose annually in cts?	terests	that could give rise to	12b	Yes	
c	Did th	ne organization regularly and consistently monitor and enforce compliance with the dule O how this was done	policy?	If "Yes," describe in	12c	Yes	
13		ne organization have a written whistleblower policy?		10 1 6 0	13	Yes	
14	Did th	ne organization have a written document retention and destruction policy?			14	Yes	
15		ne process for determining compensation of the following persons include a review ins, comparability data, and contemporaneous substantiation of the deliberation an					
а	The o	organization's CEO, Executive Director, or top management official	4		15a		No
b	Other	officers or key employees of the organization			15b		No
	If "Ye	es" to line 15a or 15b, describe the process in Schedule O (see instructions)					
16a	Did th	ne organization invest in, contribute assets to, or participate in a joint venture or si ile entity during the year?	milar a	rrangement with a	16a		No
ь	If "Ye	es," did the organization follow a written policy or procedure requiring the organization to venture arrangements under applicable federal tax law, and take steps to safegues with respect to such arrangements?	on to e	evaluate its participation	974		
	- 000				16b		
		C. Disclosure he States with which a copy of this Form 990 is required to be filed▶					
17 18		on 6104 requires an organization to make its Form 1023 (or 1024 if applicable), 99	0, and	990-T (501(c)(3)s only)			
	availa	able for public inspection. Indicate how you made these available. Check all that ap	ply				
19	Descr	Own website		7 - 11			
20	1000	r, and financial statements available to the public during the tax year the name, address, and telephone number of the person who possesses the organ	ization'	s books and records			
10		The second state of the se		ALMERICAN CONTRACTOR OF STREET			

Form 990 (2016)	Page 7

Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Check if Schedule O contains a response or note to any line in this Part VII

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

1a Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.

- List all of the organization's current officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid
 - . List all of the organization's current key employees, if any. See instructions for definition of "key employee."
- List the organization's five current highest compensated employees (other than an officer, director, trustee or key employee) who received reportable compensation (Box 5 of Form W-2 and/or Box 7 of Form 1099-MISC) of more than \$100,000 from the organization and any related organizations
- List all of the organization's former officers, key employees, or highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations
- List all of the organization's former directors or trustees that received, in the capacity as a former director or trustee of the
 organization, more than \$10,000 of reportable compensation from the organization and any related organizations

List persons in the following order individual trustees or directors, institutional trustees, officers, key employees, highest compensated employees, and former such persons

(A) Name and Title	(B) Average hours per week (list any hours	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization	(E) Reportable compensation from related organizations	(F) Estimated amount of other compensation from the
	For related	Highest compensated employee	Former	(W- 2/1099- MISC)	(W- 2/1099- MISC)	organization and related organizations				
(1) William McQuade	1 00	400	=			1				
Vice Chairman	0 00	X						ā	a	0
(2) Kevin Fay	5 00						Ϊij			
Director	0 00	X						0	0	0
(3) Mark Menzer	1 00	-0							1	
Director	0 00	X						0	0	C
(4) Nigel Ravenscroft	1 00			+						
Director	0 00	×						ø	a	C
(5) John Hurst	1 00	-						1		
Chairman	0 00	X		L			Щ	0	0	C
				H			H			
							Н	1		
				-			H	h		
				7.0		100				

Name and Title Average hours per week (list any hours for related organizations below dotted line) 1b Sub-Total . C Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total from continuation sheets to Part VII, Section A. Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization stary former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule J for such individual isted on line 1a, is the sum of reportable compensation and related organizations greater than \$150,000? If "Yes," complete Schedule J for such person Section B. Independent Contractors Compete Methods A For any individual isted on line 1a, is the sum of reportable compensation from any unrelated organization or individual for such person Section B. Independent Contractors Compete Methods A For any individual isted on line 1a, is the sum of reportable compensation from the organization from the organization for the calendary year ending with or within the organization from the o	E)		Cont	(E)	mpensate (D)		nigi	and .	-	-	mp	, key i	(B)	ction A. Officers, Direct (A)	Part VII
below dotted line) Discrete	nated of other nsation n the	Estimated amount of other compensation from the organization are related organizations		Reportable compensation from related organizations (\)	portable pensation om the zation (W-	Rep comp fro organia	on	ss pers	t che	o no ox, i in of	ne b	than o	Average hours per week (list any hours	ame and Title	
c Total from continuation sheets to Part VII, Section A	ated			2/1099-MISC	99-MISC)	2/109	Former	Highest compensated employee	Key employee	Officer	Institutional Trustee	Individual trustee or director	organizations below dotted		
c Total from continuation sheets to Part VII, Section A															
c Total from continuation sheets to Part VII, Section A															
c Total from continuation sheets to Part VII, Section A															
Of reportable compensation from the organization ▶ 0 Yes Did the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule J for such individual								*	9	-4		Α.	irt VII, Sectio	continuation sheets to P lines 1b and 1c)	c Total f
Did the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule J for such individual For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule J for such individual Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If "Yes," complete Schedule J for such person Section B. Independent Contractors Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year (A) Description of services Compensation of services Lobbying & Mgmt	1			00,000	ore than \$10	eived mo	rece	e) Who	bovi	ed a	e list				
For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule J for such individual Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If "Yes," complete Schedule J for such person Section B. Independent Contractors Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization Report compensation for the calendar year ending with or within the organization's tax year (A) Name and business address Lobbying & Mgmt	No		3	C 12.42 5 4 10 11 11 11											
Section B. Independent Contractors 1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year (A) (B) (C) (B) (C) (Compensation of services. Compensation of service	No		4	the										on and related organization	orga
Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization Report compensation for the calendar year ending with or within the organization's tax year (A) Name and business address (B) Description of services Compensation (C) Compensation (B) Description of services Lobbying & Mgmt	No		5												
(A) (B) (CONTROL OF SERVICES ADDRESS A		sation	pen										est compensate	this table for your five high	1 Com
Alcalde & Fay Lobbying & Mgmt	(C)	Compe		(B)		(III) Also		1116.1	9		7001		(A)		11 0111
Arlington, VA 22201	515,345				1										111 Wilson
wingsvii, Yr. EEEV															migsell, ve
2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization ▶ 1			of of	ore than \$100,00	received mo	e) who	abov	listed	ose	to th	ited t	not lim			

Form 990 (2016) Page 9 Part VIII Statement of Revenue Check if Schedule O contains a response or note to any line in this Part VIII (B) (C) (D) Related or Revenue Total revenue Unrelated exempt business excluded from function revenue tax under sections revenue 512-514 Federated campaigns . 1a and Other Similar Amounts Contributions, Gifts, Grants b Membership dues . 16 c Fundraising events . . 10 d Related organizations 1d e Government grants (contributions) 1e All other contributions, gifts, grants, and similar amounts not included g Noncash contributions included in lines 1a-1f \$_ h Total.Add lines 1a-1f . Business Code Service Revenue 666,190 666,190 2a Membership Dues & Assessments Program f All other program service revenue 666,190 9Total.Add lines 2a-2f 3 Investment income (including dividends, interest, and other 159 159 similar amounts) 4 Income from investment of tax-exempt bond proceeds (i) Real (ii) Personal 6a Gross rents **b** Less rental expenses c Rental income or (loss) d Net rental income or (loss) . (i) Securities (II) Other 7a Gross amount from sales of assets other than inventory b Less cost or other basis and sales expenses C Gain or (loss) d Net gain or (loss) . . . -8a Gross income from fundraising events (not including \$ of Revenue contributions reported on line 1c) See Part IV, line 18 b Less direct expenses : . . c Net income or (loss) from fundraising events . 9a Gross income from gaming activities See Part IV, line 19 . . . b Less direct expenses . . . b c Net income or (loss) from gaming activities . . . -10aGross sales of inventory, less returns and allowances . . b Less cost of goods sold . . c Net income or (loss) from sales of inventory . Miscellaneous Revenue Business Code 11a d All other revenue . Add. 99tal. Add lines ila-ild . 12 Total revenue. See Instructions 666.349 666.349 Form 990 (2016

Part IX Statement of Functional Expenses
Section 501(c)(3) and 501(c)(4) organizations must complete all columns All other organizations must complete column (A)

Check if Schedule O contains a response or note to any Do not include amounts reported on lines 6b,		(B)	(c)	
7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	Program service expenses	Management and general expenses	(D) Fundraisingexpenses
Grants and other assistance to domestic organizations and domestic governments See Part IV, line 21	0			
2 Grants and other assistance to domestic individuals. See Part IV, line 22	0			
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals See Part IV, line 15 and 16	Ď.			
4 Benefits paid to or for members	0			
5 Compensation of current officers, directors, trustees, and key employees	D			
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)	D	4		
7 Other salaries and wages	0			
8 Pension plan accruals and contributions (include section 401 (k) and 403(b) employer contributions)	0			
9 Other employee benefits	0			
10 Payroll taxes	0			
11 Fees for services (non-employees)				
a Management	550,564	440,451	110,113	
b Legal	27,481	21,985	5,496	
c Accounting	4,341	3,473	868	
d Lobbying	0			
e Professional fundraising services See Part IV, line 17	0			
f Investment management fees	0			
g Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule 0)	0			
12 Advertising and promotion	0			
13 Office expenses	12,037	9,630	2,407	
14 Information technology	0			
15 Royalties	0			
16 Occupancy	0			
17 Travel	0	7 11		
18 Payments of travel or entertainment expenses for any federal, state, or local public officials •	0			
19 Conferences, conventions, and meetings	67,800	67,800	-	
20 Interest	0			
21 Payments to affiliates	ō			
22 Depreciation, depletion, and amortization	0			
23 Insurance	0			
24 Other expenses Itemize expenses not covered above (List miscellaneous expenses in line 24e If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O)				
a EPA assessment	25,000	25,000		
b Communications	10,920	8,736	2,184	
ē.	+			
d				
e All other expenses	0			
25 Total functional expenses. Add lines 1 through 24e	698,143	577,075	121,068	0
26 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation		27.160.5		
Check here ▶ ☐ if following SOP 98-2 (ASC 958-720)				

Part X	Balance	Shoot
	Dalance	SHEEL

		Check if Schedule O contains a response or not	e to any line in this Part IX			
			5.	(A) Beginning of year		(B) End of year
	1	Cash-non-interest-bearing , ,	* 1 · f · · · · · ·	1	1	48,959
	2	Savings and temporary cash investments		436,620	2	487,329
Assets	3	Pledges and grants receivable, net		3	0	
	4	Accounts receivable, net				0
	5					
		trustees, key employees, and highest compensated employees. Complete Part			5	8,094
	6	II of Schedule L Loans and other receivables from other disquali	fied persons (as defined under			
	100	section 4958(f)(1)), persons described in section				
		contributing employers and sponsoring organiza- voluntary employees' beneficiary organizations		6	0	
	2	Part II of Schedule L			~	
	7	Notes and loans receivable, net			7	0
AS	8	Inventories for sale or use		12.050	8	
	9	Prepaid expenses and deferred charges	· · · · ·	43,250	9	43,201
	10a	Land, buildings, and equipment cost or other basis Complete Part VI of Schedule D	10a			
	ь	Less accumulated depreciation	10b		10ε	0
	11	Investments—publicly traded securities .	1		11	0
	12	Investments—other securities See Part IV, line	11		12	0
	13	Investments—program-related See Part IV, line		13	0	
	14	Intangible assets		14	0	
	15	Other assets See Part IV, line 11	1	15	0	
	16	Total assets.Add lines 1 through 15 (must equ		479,872	16	587,583
	17	Accounts payable and accrued expenses		7,675	17	48,070
	18	Grants payable	7,0,0	18	115,070	
	19	Deferred revenue	31.980	19	131,090	
	20	Tax-exempt bond liabilities	2,1838	20	145.0555	
	21	Escrow or custodial account liability Complete R		21	-	
68	22	Loans and other payables to current and former		21		
Liabilities	22	key employees, highest compensated employee			20	
ia	22	persons Complete Part II of Schedule L		22		
Ξ	23	Secured mortgages and notes payable to unrela		23		
	24	Unsecured notes and loans payable to unrelated	The state of the s		24	
	25	Other liabilities (including federal income tax, p. and other liabilities not included on lines 17-24) Complete Part X of Schedule D	12,500	25	12,500	
	26	Total liabilities. Add lines 17 through 25	52,155	26	191,660	
S	-	Organizations that follow SFAS 117 (ASC 9	58), check here > V and			
ce		complete lines 27 through 29, and lines 33			12-b	.241914
3	27	Unrestricted net assets		427,717	27	395,923
B	28	Temporarily restricted net assets		28		
5	29	Permanently restricted net assets			29	
교	-	Organizations that do not follow SFAS 117	The state of the s			
0	30	check here ► and complete lines 30 th Capital stock or trust principal, or current funds	rough 34.		30	
Assets or Fund Balances	31	Paid-in or capital surplus, or land, building or ed			31	
55	32	Retained earnings, endowment, accumulated in			32	
A	33	Total net assets or fund balances	The state of the s	427,717	33	395,923
Net	34		479,872	34	587,583	
15	34	Total liabilities and net assets/fund balances		419,012	34	Form 900 (2016)

Part XI	T Reconciliation of Net Assets			
	Check if Schedule O contains a response or note to any line in this Part XI	4		
1	Total revenue (must equal Part VIII, column (A), line 12)			666,349
1 2	Total expenses (must equal Part IX, column (A), line 25)			698,143
CX.	Revenue less expenses Subtract line 2 from line 1			-31,794
2	Net assets or fund balances at beginning of year (must equal Part X, line 33, column (A))		+	427,717
2	Net unrealized gains (losses) on investments			
5	Donated services and use of facilities			
1 L	Investment expenses			
G.	Prior period adjustments			
0	Other changes in net assets or fund balances (explain in Schedule 0)			
10 N	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 33, column (B))			395,923
Part XII	Financial Statements and Reporting			
	Check if Schedule O contains a response or note to any line in this Part XII		:	
4 H	Accounting method used to prepare the Form 990 💛 Cash 🗹 Accrual 🗘 Other. If the organization changed its method of accounting from a prior year or checked "Other," explain in		Yes	S.
2a W	Schedule U 2a Were the organization's financial statements compiled or reviewed by an independent accountant?	2a		No
F W	If 'Yes,' check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both			
	Separate basis Consolidated basis Both consolidated and separate basis			
S q	b. Were the organization's financial statements audited by an independent accountant?	26	Yes	
Ħ 0	If 'Yes,' check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both			
	Separate basis			
0	c If "Yes," to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant?	20	Yes	
E	If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O			
3a A	3a As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133?	3a		8
b 1	If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits.	, K		

Additional Data

Software ID: 16000303 Software Version: 2016v3.0

EIN: 52-1207922

ALLIANCE FOR RESPONSIBLE ATMOSPHERIC POLICY INC Name:

Form 990, (2016)

Form 990, Part III, Line 4a:

CONFERENCES AND METINGS - COMMUNICATION TO MEMBERS, PUBLIC AND MEDIA ON ISSUES RELATED TO FLOUROCARBONS

Form 990, Part III, Line 4b: REGULATORY ACTION PROGRAM--PREPARATION OF COMMENTS IN ORDER TO EDUCATE AND KEEP REGULATORY OFFICIALS AND BODIES INFORMED ABOUT FLOUROCARBON ISSUES AT STATE/LOCAL LEVELS

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DLN: 93493233009127

SCHEDULE C (Form 990 or 990-

Political Campaign and Lobbying Activities

OMB No 1545-0047

For Organizations Exempt From Income Tax Under section 501(c) and section 527

	► Complete if the organization is described below. ► Attach to Form 990 or Form 990-EZ. ► Information about Schedule C (Form 990 or 990-EZ) and its instructions is at						Open to Public				
	partment of the Treasurs email Revenue Service www.irs.qov/form990.								Inspection		
f the	Section 501(c)(3) on Section 501(c) (oth Section 527 organize organization ans Section 501(c)(3) o Section 501(c)(3) o e organization ans xy Tax) (see sepai	ganizations Competed than section 50 zations Completed wered "Yes" on larganizations that have a constructions and the constructions of	Form 990, Part IV, Line 4, or Forn ave filed Form 5768 (election und ave NOT filed Form 5768 (election Form 990, Part IV, Line 5 (Proxy	lete Part I-C arts I-A and C below m 990-EZ, Part VI, II er section 501(h)) C n under section 501(l	Do not com ne 47 (Lobby omplete Part h)) Complete	plete Part I- ying Activit II-A Do not Part II-B D	B nes), comp	then plete Part II- t complete P	B art II-A		
Na	me of the organizat	tion	dona complete Fart III		E	mployer id	entif	fication num	nber		
	IANCE FOR RESPONSI ICY INC	BLE ATMOSPHERIC			5	2-1207922					
Par	t I-A Complet	te if the organi	zation is exempt under sec	tion 501(c) or is	a section	527 orga	niza	tion.			
1 2	Political expenditi		ation's direct and indirect political	campaign activities i	n Part IV	1	\$				
3	Volunteer hours t I-B Complet	to if the organi	zation is exempt under sec	tion 501(c)(2)			_				
1			incurred by the organization under			- 4	4				
2		and the second second	incurred by organization manager				\$				
3			in 4955 tax, did it file Form 4720 f			10		☐ Yes	THE.		
4a	Was a correction		,, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	or one year				□ Yes	□ No		
b	If "Yes," describe	In Part TV						L Yes	LI NO		
			zation is exempt under sec	tion 501(c), exc	ept section	1 501(c)(3).				
1			by the filing organization for sect				\$				
2		t of the filing organ	nization's funds contributed to other				\$				
3	Yestsective Producti		Add lines 1 and 2 Enter here an	d on Form 1120-POL	, line 17b		\$				
4	Did the filing orga	anization fileForm	1120-POL for this year?				*	☐ Yes	☑ No		
5	organization mad of political contrib	le payments. For e outions received th	nployer identification number (EIN ach organization listed, enter the at were promptly and directly deli (PAC) If additional space is need	amount paid from the vered to a separate	e filing organ political organ	ization's fun iization, suc	ds A	the filing Iso enter the	amount		
	(a) Nam	e	(b) Address	(c) EIN	filing org funds If	int paid from ganization's none, enter -0-		(e) Amount contribution and promp directly deliverable organization enter	s received ptly and vered to a political of If none,		
2		1									
3											
4											
5											
6							T.				

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

Schedule C (Form 990 or 990-EZ) 2016 Cat No 50084S

Sch	edule C (Form 990 or 990-EZ) 2016					Page 2
	art II-A Complete if the organization is e section 501(h)).	exempt under section	on 501(c)(3)	and filed For	m 5768 (electi	
A	Check Inf the filing organization belongs to an expenses, and share of excess lobbying		in Part IV each a	iffiliated group r	nember's name, ac	dress, EIN,
В	Check ▶ ☐ If the filing organization checked box A	and "limited control" p	rovisions apply			
	Limits on Lobbyi (The term "expenditures" mea		curred.)		(a) Filing organization's totals	(b) Affiliated group totals
1a	Total lobbying expenditures to influence public opinio	on (grass roots lobbying)	(
b	Total lobbying expenditures to influence a legislative	body (direct lobbying)				
c	Total lobbying expenditures (add lines 1a and 1b)	The state of the s				
d	Other exempt purpose expenditures					
e	Total exempt purpose expenditures (add lines 1c and	d 1d)				
f	Lobbying nontaxable amount Enter the amount from columns	n the following table in b	oth			
	If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxa	ble amount is:			
	Not over \$500,000	20% of the amount on line	ie .		1 4	
	Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the	excess over \$500,00	0		
	Over 51,000,000 but not over 51,500,000	\$175,000 plus 10% of the	excess over \$1,000,	000		
	Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the ex	cess over \$1,500,0	00		
	Over \$17,000,000	\$1,000,000				
	Grassroots nontaxable amount (enter 25% of line 1f. Subtract line 1g from line 1a. If zero or less, enter -0. Subtract line 1f from line 1c. If zero or less, enter -0.)-				
	If there is an amount other than zero on either line 1 section 4911 tax for this year?		inization file Forn	4720 reporting		☐ Yes ☐ No
	4-Year Av (Some organizations that made a s columns below. See t		tion do not h	ave to compl		ve
	Lobbying Expe	enditures During 4-	Year Averagi	ng Period	340	
	Calendar year (or fiscal year beginning in)	(a) 2013	(b) 2014	(c) 2015	(d) 2016	(e) Total
2a	Lobbying nontaxable amount					
b	Lobbying ceiling amount (150% of line 2a, column(e))	1.11				
С	Total lobbying expenditures					
d	Grassroots nontaxable amount					
ė	Grassroots ceiling amount (150% of line 2d, column (e))					

Schedule C (Form 990 or 990-EZ) 2016

	Form 5768 (election under section 501(h)). each "Yes" response on lines 1a through 1i below, provide in Part IV a detailed description of the lobbying	(a)		(b)
activ		Yes	No	Am	ount
1	During the year, did the filing organization attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of				
а	Volunteers?				
b			10.00		
c	Media advertisements?				
d	Mailings to members, legislators, or the public?				
e	Publications, or published or broadcast statements?				
f	Grants to other organizations for lobbying purposes?				
g	Direct contact with legislators, their staffs, government officials, or a legislative body?				
h					
į.	Other activities?				
j	Total Add lines 1c through 1i				
2a	Did the activities in line 1 cause the organization to be not described in section 501(c)(3)?		1		
b					
C	If "Yes," enter the amount of any tax incurred by organization managers under section 4912				
d	If the filing organization incurred a section 4912 tax, did it file Form 4720 for this year?			7 -	
Pai	rt III-A Complete if the organization is exempt under section 501(c)(4), section 501(6).	c)(5), a	r secti	on 50	1(c)
				11.4	
			-		es No
1	Were substantially all (90% or more) dues received nondeductible by members?		Ē	1	No No
1 2	Were substantially all (90% or more) dues received nondeductible by members? Did the organization make only in-house lobbying expenditures of \$2,000 or less?				
	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year?			1 2 3	No No No
2	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? THE Complete if the organization is exempt under section 501(c)(4), section 501(and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Palanswered "Yes."			1 2 3 on 50	No No No
2 3 Par	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? THE Complete if the organization is exempt under section 501(c)(4), section 501(and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Palanswered "Yes." Dues, assessments and similar amounts from members			1 2 3 on 50	No No No
2 3 Pa	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? THE Complete if the organization is exempt under section 501(c)(4), section 501(and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Palanswered "Yes."	1		1 2 3 on 50	No No No 1(c)(6)
2 3 Pai	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? THE Complete if the organization is exempt under section 501(c)(4), section 501(and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Palanswered "Yes." Dues, assessments and similar amounts from members Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid). Current year	1 1 2a		1 2 3 on 50	No No No 1(c)(6)
2 3 Par 1 2	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? TETIT-B Complete if the organization is exempt under section 501(c)(4), section 501(and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Palanswered "Yes." Dues, assessments and similar amounts from members Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid). Current year Carryover from last year	1 2a 2b		1 2 3 on 50	No No No 1(c)(6)
2 3 Pal 1 2 a b	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? TETIT-B Complete if the organization is exempt under section 501(c)(4), section 501(and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Palanswered "Yes." Dues, assessments and similar amounts from members Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid). Current year Carryover from last year Total	1 2a 2b 2c		1 2 3 on 50	No No No 1(c)(6) 666,190 200,000
2 3 Pal 1 2 a b c 3	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? III-B Complete if the organization is exempt under section 501(c)(4), section 501(and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Palanswered "Yes." Dues, assessments and similar amounts from members Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid). Current year Carryover from last year Total Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues	1 2a 2b 2c 3		1 2 3 on 50	No No No 1(c)(6)
2 3 Pai 1 2 a b c	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? **TIII-B** Complete if the organization is exempt under section 501(c)(4), section 501(c) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Paraswered "Yes." Dues, assessments and similar amounts from members Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid). Current year Carryover from last year Total Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess doe the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political	2a 2b 2c 3		1 2 3 on 50	No No No 1(c)(6) 666,190 200,000
2 3 Pal 1 2 a b c	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? TETIT-B Complete if the organization is exempt under section 501(c)(4), section 501(c) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Paranswered "Yes." Dues, assessments and similar amounts from members Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid). Current year Carryover from last year Total Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues. If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess doe the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year?	1 2a 2b 2c 3		1 2 3 on 50	No No No 1(c)(6) 666,190 200,000
2 3 Pa 1 2 a b c 3 4	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? III-B Complete if the organization is exempt under section 501(c)(4), section 501(c) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Paranswered "Yes." Dues, assessments and similar amounts from members Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid). Current year Carryover from last year Total Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess doe the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year? Taxable amount of lobbying and political expenditures (see instructions)	2a 2b 2c 3		1 2 3 on 50	No No No 1(c)(6) 666,190 200,000
2 3 Pai 1 2 a b c 3 4	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? IT III-B Complete if the organization is exempt under section 501(c)(4), section 501(c) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Paranswered "Yes." Dues, assessments and similar amounts from members Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid). Current year Carryover from last year Total Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues. If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess doe the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year? Taxable amount of lobbying and political expenditures (see instructions) Supplemental Information Evident to the descriptions required for Part I-A, line 1, Part I-B, line 4, Part I-C, line 5, Part II-A (affiliated group list evidence in the properties of the properties of the descriptions required for Part I-A, line 1, Part I-B, line 4, Part I-C, line 5, Part II-A (affiliated group list evidence in the properties of the descriptions required for Part I-A, line 1, Part I-B, line 4, Part I-C, line 5, Part II-A (affiliated group list evidence in the properties of th	2a 2b 2c 3 5 4 5	, line 3	1 2 3 3 oon 50 , is	No No No 1(c)(6) 666,190 200,000 200,000 333,099
2 3 Pa 1 2 a b c 3 4	Did the organization make only in-house lobbying expenditures of \$2,000 or less? Did the organization agree to carry over lobbying and political expenditures from the prior year? III-B Complete if the organization is exempt under section 501(c)(4), section 501(c) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Paranswered "Yes." Dues, assessments and similar amounts from members Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid). Current year Carryover from last year Total Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues. If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess doe the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year? Taxable amount of lobbying and political expenditures (see instructions) Supplemental Information	2a 2b 2c 3 5 4 5	, line 3	1 2 3 3 oon 50 , is	No No No 1(c)(6) 666,190 200,000 200,000 333,099

SCHEDULE D (Form 990)

Supplemental Financial Statements

Complete if the organization answered "Yes," on Form 990,
 Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b.
 ► Attach to Form 990.

OMB No 1545-0047

Open to Public

Department of the Treasury

Information about Schedule D (Form 990) and its instructions is at www.irs.gov/form990.

ALL	me of the organization IANCE FOR RESPONSIBLE ATMOSPHERIC ICY INC			Employer i	dentification num	nber
Pa	Organizations Maintaining Donor Complete if the organization answere					
	- I /	(a) Donor advised funds		(b)Funds a	and other accounts	
1	Total number at end of year					
2	Aggregate value of contributions to (during year)					
3	Aggregate value of grants from (during year)					
4	Aggregate value at end of year					
5	Did the organization inform all donors and donor funds are the organization's property, subject to			dvised	☐ Yes	□ No
6	Did the organization inform all grantees, donors, used only for charitable purposes and not for the conferring impermissible private benefit?	and donor advisors in writing the benefit of the donor or donor a	nat grant funds can dvisor, or for any c	be other purpose	☐ Yes	□ No
Pa	t II Conservation Easements. Complet	e if the organization answe	red "Yes" on For	m 990, Part 1		
1	Purpose(s) of conservation easements held by the	e organization (check all that ap	oply)			
	Preservation of land for public use (e.g., rec	reation or education)	Preservation of a	n historically in	nportant land area	
	Protection of natural habitat		Preservation of a	certified histor	ic structure	
	Preservation of open space					
2	Complete lines 2a through 2d if the organization easement on the last day of the tax year	held a qualified conservation co	ntribution in the fo	The state of the s	vation at the End of the	Year
а	Total number of conservation easements			2a		
b	Total acreage restricted by conservation easemen			2b		
c	Number of conservation easements on a certified		The state of the s	2c		
d	Number of conservation easements included in (c structure listed in the National Register) acquired after 8/17/06, and n	ot on a historic	2d		
3	Number of conservation easements modified, trantax year ▶	nsferred, released, extinguished	, or terminated by	the organizati	on during the	
4	Number of states where property subject to conse	ervation easement is located >				
5	Does the organization have a written policy regar and enforcement of the conservation easements i	ding the periodic monitoring, in	spection, handling	of violations,	☐ Yes ☐	No
6	Staff and volunteer hours devoted to monitoring,	inspecting, handling of violation	ns, and enforcing c	conservation ea		e year
7	Amount of expenses incurred in monitoring, inspenses \$	ecting, handling of violations, ar	nd enforcing conse	rvation easeme	ents during the yea	r
8	Does each conservation easement reported on lin and section $170(h)(4)(B)(\pi)^7$	e 2(d) above satisfy the require	ements of section I	L70(h)(4)(B)(ı)	☐ Yes ☐	No
9	In Part XIII, describe how the organization report balance sheet, and include, if applicable, the text the organization's accounting for conservation ea	of the footnote to the organiza				
Par	t III Organizations Maintaining Collect Complete if the organization answere	tions of Art, Historical Tr		ner Similar A	Assets.	
1a	If the organization elected, as permitted under SF art, historical treasures, or other similar assets he provide, in Part XIII, the text of the footnote to it	FAS 116 (ASC 958), not to repo ald for public exhibition, educat	rt in its revenue st ion, or research in	atement and b furtherance of	alance sheet works public service,	of
ь	If the organization elected, as permitted under Sf historical treasures, or other similar assets held following amounts relating to these items					
(i) Revenue included on Form 990, Part VIII, line 1			▶\$		
(i)Assets included in Form 990, Part X			▶ 5		
2	If the organization received or held works of art, following amounts required to be reported under			ancial gain, pro	ovide the	
а	Revenue included on Form 990, Part VIII, line 1			▶ \$	1	
6	Assets included in Form 990, Part X			▶ s		

Par	III	Organizations Maintaining Co	ollections of Art,	Histor	ical T	reas	ures, or Oth	ner Simila	ar Assets	(contin	ued)	
3		the organization's acquisition, accessi (check all that apply)	on, and other records	s, check	any of	the fo	ollowing that a	re a signific	cant use of it	s colle	ection	
а		Public exhibition		d		Loar	or exchange	programs				
ь		Scholarly research		e		Othe	er					
c		Preservation for future generations										
	Provide Part	de a description of the organization's ci	ollections and explain	how th	ey furt	her th	e organization	's exempt ;	purpose in			
5	Durin	g the year, did the organization solicit s to be sold to raise funds rather than	or receive donations to be maintained as p	of art, h	istorica he orga	al trea	sures or other ion's collection	similar ?	□ y	05	□ No	
Pai	t IV	Escrow and Custodial Arrang Complete if the organization and X, line 21.		rm 990), Part	IV,	ine 9, or rep	orted an a				
la	Is the	e organization an agent, trustee, custod ded on Form 990, Part X7	dian or other interme	diary foi	r contri	bution	ns or other ass	ets not	□ Y	es	□ No	r
ь	If "Vo	es," explain the arrangement in Part XI	II and complete the f	following	tahla				Amount		-	
c		ining balance	T and somplete till I	- wearing	,		1c		- mire perile			
d	7	ions during the year					id					
e		butions during the year					1e					
f		g balance					16					
а		ne organization include an amount on F	orm 990, Part X, line	21, for	escrov	v or ci	ustodial accour	nt liability?	□ Y		□ No	
b		s," explain the arrangement in Part XI										
Pa	rt V	Endowment Funds. Complete		answe	red "Y	es" o	n Form 990,	Part IV, I	ne 10.			
			(a)Current year	(b)F	rior yea	r	(c)Two years b	ack (d)Thr	ee years back	(e)Fo	our years	back
		ing of year balance						_				
		outions	1			-		-		-		
		restment earnings, gains, and losses	-			-		-+-		-		
		or scholarships				-	_	-		-		
	and pro	expenditures for facilities ograms										
		strative expenses				-						
g		year balance			_				4	1		
		de the estimated percentage of the cur	rent year end balanc	e (line 1	g, colu	mn (a	a)) held as					
а		i designated or quasi-endowment >										
b	0.54	anent endowment >										
C		oranly restricted endowment >	Name and Address									
		ercentages on lines 2a, 2b, and 2c sho		a de aleman	6	ara a		J 6 11				
а	organ	nere endowment funds not in the posse	ession of the organiza	ation tha	it are n	eld al	no administere	o for the	rs	[Yes	No
		nrelated organizations		W . F		3 3	1 1 3		_	a(i) a(ii)		
b	If "Ye	elated organizations , , . . . s" on 3a(ii), are the related organization	ons listed as required			7 .	• • • • •	0.91.18		3b		
-	_	ibe in Part XIII the intended uses of th	1000	owment	funds							
a	t VI	Land, Buildings, and Equipme Complete if the organization and		m 990	Part	tv. h	ne 11a. See	Form 990	Part X lir	ne 10		
	Descri	ption of property (a) Cost or o	ther basis (b)Cos	t or other							ok value	
a	Land	* * *										
	Buildin		-									
		old improvements	-				1					
		nent 4 x y										
	~ 4											
		lines 1a through 1e (Calumn (d) must				- Book	100-11	•	_			

(a) Description of security or category (including name of security)	(b)B		(c)Method of valuation Cost or end-of-year market value
1)Financial derivatives			
A)		11112	
3)			
c)			
D)			
E)			
F)			
G)			
H)			
Total. (Column (b) must equal Form 990, Part X, col. (B) line 12.)			
Part VIII Investments—Program Related. Compl. See Form 990, Part X, line 13.	ete if the organization	answered 'Yes	on Form 990, Part IV, line 11c
(a) Description of investment	(b) Book va		(c) Method of valuation Cost or end-of-year market value
(1)			cost of end-of year market state
(2)			
(3)			
(4)			
5)			
(6)			
(7)			
(8)			
(9)		-	
Part IX Other Assets, Complete if the organization and (a) Desi		, Part IV, line 11	d See Form 990, Part X, line 15 (b) Book v
	swered 'Yes' on Form 990	, Part IV, line 11	
Part IX Other Assets, Complete if the organization and (a) Description (1)	swered 'Yes' on Form 990	, Part IV, line 11	
Part IX Other Assets, Complete if the organization and (a) Design (1)	swered 'Yes' on Form 990	, Part IV, line 1:	
Part IX Other Assets. Complete if the organization and (a) Design (1) (2)	swered 'Yes' on Form 990	, Part IV, line 11	
Part IX Other Assets, Complete if the organization and (a) Design (1) (2) (3)	swered 'Yes' on Form 990	, Part IV, line 1:	
Part IX Other Assets. Complete if the organization and (a) Design (1) (2) (3) (4)	swered 'Yes' on Form 990	, Part IV, line 11	
Part IX Other Assets, Complete if the organization and (a) Design (1) (2) (3) (4) (5)	swered 'Yes' on Form 990	, Part IV, line 1:	
Part IX Other Assets. Complete if the organization and (a) Design (1) (2) (3) (4) (5)	swered 'Yes' on Form 990	, Part IV, line 1:	
Part IX Other Assets, Complete if the organization and (a) Design (b) Design (c) (a) Design (c) (a) Design (c) (c) (d) (d) (e) (e) (e) (e) (e) (e) (e) (e) (e) (e	swered 'Yes' on Form 990 cription	7-4 T 3	(b) Book v
Part IX Other Assets, Complete if the organization and (a) Design (b) Design (c) (a) Design (c) (a) Design (c) (d) (d) (d) (e) (e) (e) (e) (e) (e) (e) (e) (e) (e	swered 'Yes' on Form 990 cription 5) tion answered 'Yes' or	7-4 T 3	(b) Book v
Part IX Other Assets, Complete if the organization and (a) Design (b) Design (c) (a) Design (c) (a) Design (c) (c) (d) (d) (e) (e) (e) (e) (e) (e) (e) (e) (e) (e	swered 'Yes' on Form 990 cription 5) tion answered 'Yes' or		(b) Book v
(1) (2) (3) (4) (5) (6) (7) (8) (9) (7) (A) Other Liabilities. Complete if the organization and the complete in the complete in the complete in the complete in the organization of the complete in th	swered 'Yes' on Form 990 cription 5) tion answered 'Yes' or		ort IV, line 11e or 11f.
Part IX Other Assets, Complete if the organization and (a) Design (a) Description of liability (b) Federal income taxes	swered 'Yes' on Form 990 cription 5) tion answered 'Yes' or	Form 990, Pa	ort IV, line 11e or 11f.
Part IX Other Assets, Complete if the organization and (a) Design (a) Description of liability Part X Other Liabilities. Complete if the organization of Description of Liability (a) Description of Liability Due to ICCP 2)	swered 'Yes' on Form 990 cription 5) tion answered 'Yes' or	Form 990, Pa	ort IV, line 11e or 11f.
Part IX Other Assets, Complete if the organization and (a) Desired (a) Description of liability 1) Federal income taxes Oue to ICCP 2)	swered 'Yes' on Form 990 cription 5) tion answered 'Yes' or	Form 990, Pa	ort IV, line 11e or 11f.
Part IX Other Assets, Complete if the organization and (a) Design	swered 'Yes' on Form 990 cription 5) tion answered 'Yes' or	Form 990, Pa	ort IV, line 11e or 11f.
Part IX Other Assets, Complete if the organization and (a) Design (a) Description of liability (b) Federal income taxes Oue to ICCP (a) Description of liability (b) Federal income taxes	swered 'Yes' on Form 990 cription 5) tion answered 'Yes' or	Form 990, Pa	ort IV, line 11e or 11f.
Part IX Other Assets, Complete if the organization and (a) Design (b) Design (c) (a) Design (c) (b) Design (c) (c) (d) (d) (d) (e) (e) (e) (e) (e) (e) (e) (e) (e) (e	swered 'Yes' on Form 990 cription 5) tion answered 'Yes' or	Form 990, Pa	ort IV, line 11e or 11f.
Part IX Other Assets, Complete if the organization and (a) Design (b) Design (c) (a) Design (c) (b) (c) (d) (d) (d) (e) (e) (e) (e) (e) (e) (e) (e) (e) (e	swered 'Yes' on Form 990 cription 5) tion answered 'Yes' or	Form 990, Pa	ort IV, line 11e or 11f.

Page 4

Part XIII Supplemental Information

Provide the descriptions required for Part II, lines 3, 5, and 9, Part III, lines 1a and 4, Part IV, lines 1b and 2b,
Part V, line 4, Part X, line 2, Part XI, lines 2d and 4b, and Part XII, lines 2d and 4b. Also complete this part to provide any additional information

Return Reference	Explanation	
		Schedule D (Form 990) 2015

Page 5 Explanation Schedule D (Form 990) 2015

Part XIII Supplemental Information (continued) Return Reference

Schedule D (Form 990) 2016

CITIC SUALITY PILITY	C print - D	t - DO NO! PROCESS	CE33	AS FI	As Filed Data -					LN: 93	34932	DLN: 93493233009127
Schedule L (Form 990 or 990-EZ) Department of the Treasura.		Transactions with Interested Persons ▶ Complete if the organization answered "Yes" on Form 990, Part IV, lines 25a, 25b, 26, 27, 28a, 28b, or 28c, or Form 990-EZ, Part V, line 38a or 40b. ▶ Attach to Form 990 or Form 990-EZ. ▶Information about Schedule L (Form 990 or 990-EZ) and its instructions is at www.irs.gov/form990.	ans:	Comple 990, Pa or Form	1S with Interest ete if the organization a ort IV, lines 25a, 25b, 26 990-EZ, Part V, line 38a h to Form 990 or Form lie L (Form 990 or 990-1	Transactions with Interested Persons ► Complete if the organization answered "Yes" on Form 990, Part IV, lines 25a, 25b, 26, 27, 28a, 28b, or 28c, or Form 990-EZ, Part V, line 38a or 40b. ► Attach to Form 990 or Form 990-EZ. ormation about Schedule L (Form 990 or 990-EZ) and its instructions www.irs.gov/form990.	d Persons swered 27, 28a, 28b, or or 40b. 0-EZ.) and its instruc	Or 28c,	is at	ō	20 Open	2016 Open to Public Inspection
Name of the organization ALLIANCE FOR RESPONSIBLE ATMOSPHERIC POLICY INC	anization PONSIBLE ATM	OSPHERIC						Emp 52-1	Employer ic 52-1207922	Employer identification number 52-1207922	ation n	umber
Part I Exce	ss Benefit	Excess Benefit Transactions (section 501(c)(3), section 501(c)(4), and 501(c)(29) organizations only) Complete if the organization answered "Yes" on Form 990, Part IV, line 25a or 25b, or Form 990-EZ, Part V, line 40b	rered "Y	non 501(u	c)(3), section orm 990, Part	501(c)(4), and IV, line 25a or	1 501(c)(29) or 25b, or Form	rganizatio	ns only Part V,) line 40b		
1 (a) Name of dis	(a) Name of disqualified person	م ا	(9)	Relationship b	(b) Relationship between disqualified person and organization	ified person a	(c)	Description transaction	(c) Description of transaction	111111	(d) Corrected?
2 Enter the amount 4958. 3 Enter the amount Part II Complete	e amount of tax, is amount of tax, Loans to and Complete if the o	of tax incurred by organization managers or disqualified persons during the year under section of tax, if any, on line 2, above, reimbursed by the organization. • and/or From Interested Persons. If the organization answered "Yes" on Form 990-EZ, Part V, line 38a, or Form 990, Part IV, line 26, or if the organization	ganizati 2, abor Iteresi	on mana re, reimb red Per	gers or disqua ursed by the c sons.	Infed persons (organization . Part V, line 3	during the year	ar under s	oction .	\$ \$ \$26, or if	the org	anization
(a) Name of (b) Relationship interested person with organization	(b) Relation with organiz	reported an amount on Form 990, Park X, line 5, b, or 22 f (b) Relationship (c) Purpose (d) Loan to or from son with organization of loan organization?	ose (d) Loan t	(d) Loan to or from the organization?	(e)Original principal amount	(f)Balance due	(g) In default?		(h) Approved by board or committee?		(i)Written agreement?
				0	From			Yes No		No.	Yes	ž
									-			
Part III Gra	Grants or Assi Complete of the	Grants or Assistance Benefiting Interested Persons. Complete if the organization answered "Yes" on Form 990.	efiting	J Intere	ssted Perso	ins. 990. Part IV.	line 27.		or Herri			
(a) Name of interested person	ested person	(b) Relationship between interested person and the organization	ilationship be ited person a organization	tween nd the	(c) Amount			of assista	nce	nd (e)	rpose o	(e) Purpose of assistance

Add. 114a

	sons.	
	d Pers	
	Interestec	
	J Inte	
	Business Transactions Involving Interested Persons.	
16	ons I	
-EZ) 201	ınsacti	
r 990	s Tra	
ه 990 د	sines	
(Form		
Schedule L (Form 990 or 990-EZ) 2016	Part IV	

	(e) Sharing	ot	organization's	revenues?	Yes No	o N				
, 28b, or 28c.	(d) Description of transaction		<u>o</u>			515,345 Lobbying & Mgt			ns)	9
if the organization answered "Yes" on Form 990, Part IV, line 28a, 28b, or 28c.	(c) Amount of	transaction				515,345			Schedule L (see instructio	Explanation
nswered "Yes" on Form	(b) Relationship	between Interested	person and the	organization		Director			esponses to questions on	
Complete if the organization ai	(a) Name of Interested person					(1) Alcalde & Fay			Part V Supplemental Information Provide additional information for responses to questions on Schedule L (see instructions)	Return Reference

Schedule L (Form 990 or 990-EZ) 2016

Explanation

Return Reference

efile GRAPHIC prin	efile GRAPHIC print - DO NOT PROCESS As Filed Data -	DLN: 93493233009127
SCHEDIII F O	Supplemental Information to Form 990 or 990-F7	r 990-F7 OMB No 1545-0047
(Form 990 or 990-	Complete to provide information for responses to specific questions on Form 990 or 990-F5 or to provide any additional information.	estions on 2016
E.C.)	► Attach to Form 990 or 990-EZ.	
Department of the Treasur	▶ Information about Schedule O (Form 990 or 990-EZ) and its instructions is at www.irs.gov/form990.	structions is at Open to Public Inspection
Name of the organization		Employer identification number
ALLIANCE FOR RESPONSIBLE POLICY INC	E A I MOSPHERIC	52-1207922
990 Schedule O, Sul	990 Schedule O, Supplemental Information	

Return Reference	Explanation
Form 990, Part VI, Line 3 Description of Delegated Duties to Management Company	Form 990, Part VI, Line 3 Day-to-Day Operations directed by management company Part VI, Line 3 Description of Delegated Duties to Management Company

990 Schedule O, Supplemental Information

o review was or will be co	Explanation	nnducted
0	Explanation	No review was or will be conducted

990 Schedule O, Supplemental Information

Return Reference	Explanation
Form 990, Part VI, Line 19 Other Organization Documents Publicly Available	No documents available to the public

efile GRAPHIC print - DO NOT PROCESS | As Filed Data -

For Paperwork Reduction Act Notice, see the separate instructions.

Department of the

Internal Revenue Service

Treasury

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

▶ Do not enter social security numbers on this form as it may be made public

▶ Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No 1545-0047

DLN: 93493273008449

2018

Open to Public Inspection

Form 990 (2018)

Cat No 11282Y

		C Name of organization	eginning 01-01-2018 , and ending	12-31-20		Employee	rdont f	cation number
☐ Ad	ck if applicable dress change me change	ALLIANCE FOR RESPONSIBLE A POLICY INC	TMOSPHERIC			52-12079		Cation number
	tial return	Doing business as						
	al return/terminated nended return		if mail is not delivered to street address) R	Róóm/suite	- E	Telephone i	number	
	plication pending	2111 WE CON BOULEVADO	Than a not survivored to at set deal casy	osmy sunc		(703) 243	-0344	
		City or town, state or province, ARLINGTON, VA 22201	country, and ZIP or foreign postal code			Gross recei	pts \$ 80	13,336
		F Name and address of prin	cipal officer	H(a) Is this a	group retu	rn for	
		Kevin Fay 2111 WILSON BOULEVARD I ARLINGTON, VA 222013051		H(subordina b) Are all su	bordinates		☐Yes ☑No ☐Yes ☑No
I Ta:	x-exempt status	☐ 501(c)(3) ☑ 501(c)(6) ◀ (insert no) ☐ 4947(a)(1) or ☐	527	If "No," a		(see	instructions)
) W	ebsite;► ww		\$ 140000 A 100000 A		c) Group ex			
K Form	n of organization	☑ Corporation ☐ Trust ☐	Association ☐ Other ►	L Ye	ear of formation	1 1994 N	1 State	of legal domicile VA
0	S.v.							
Pa		mary scribe the organization's mission	on or most significant activities					
ų.	See Part I	III, Line 1						
E P								
/em	2 may 2		a confirmation and dissert accom-		N F 0200 0		Ser.	
Activities & Governance	2 Check th 3 Number	is box 🕨 🔲 if the organization of voting members of the gove	n discontinued its operations or disposi erning body (Part VI, line 1a)	ed of more	than 25% of	its net ass	ets 3	28
ø	4 Number	of independent voting member	s of the governing body (Part VI, line	1b)	4 4 4		4	28
De	5 Total nur	mber of individuals employed i	n calendar year 2018 (Part V, line Za)		100		5	0
5	6 Total nur	mber of volunteers (estimate if	necessary)	n marie s			6	
ğ	7a Total uni	related business revenue from	Part VIII, column (C), line 12		* * *		7a	
	b Net unre	lated business taxable income	from Form 990-T, line 34	9-9-1	7.4		7b	1
	3-5-1				Prior '	Year		Current Year
9	The second second	tions and grants (Part VIII, line				- 445 - 5	1	
Ravenua		service revenue (Part VIII, line	집 경기 그렇다는 살이 빠뜨리는 얼마 그렇게 하는 이 생각이 했다.			646,65	-	803,225
B.		ent income (Part VIII, column (-		56	-	111
	HE -DY 70-4	이 그 이 가는 사람이 되었다. 이 사람이 없	nes 5, 6d, 8c, 9c, 10c, and 11e)	450		3,32 650,54	_	803,330
-			(must equal Part VIII, column (A), line X, column (A), lines 1-3)			020,54	1	003,330
				-			+	
un.		14 Benefits paid to or for members (Part IX, column (A), line 4)						
xpenses	65.00		column (A), line 11e)				1	(
ре	10-2-5 LONG - N	raising expenses (Part IX, column						
Ă			nes 11a-11d, 11f-24e)			720,88	9	992,064
	18 Total exp	penses Add lines 13-17 (must	equal Part IX, column (A), line 25)			720,88	9	992,064
	19 Revenue	less expenses Subtract line 1	8 from line 12	Ŷ		-70,34	8	-188,728
Net Assets or Fund Balances					Beginning of (urrent Yea	r	End of Year
See	20 Total ass	sets (Part X, line 16)				338,18	2	149,347
P P	21 Total liab	oilities (Part X, line 26) .		16		10	7	(
ž2	22 Net asse	ts or fund balances Subtract (ne 21 from line 20			338,07	5	149,347
		ature Block						
			xamined this return, including accomp lete. Declaration of preparer (other th					
any k	nowledge	0.105.00.000000000000000000000000000000	-0-34-244 24-645 FAG D		8,000	1	400	A 2012/19/00 GORD
	1				2019-09	9-30		
Sign	Signat	ure of officer			Date			
Here	(CGALIE	Fay Executive Director						
		or print name and title			-			
		Print/Type preparer's name	Preparer's signature	Date	Check		N 0000476	i
Paid		Firm's name ALCORN & CURET	ON Ltd CPAs		self-em	ployed IN ► 54-12	07380	
the same of the same of	Only		The state of the s					
use	Only	Firm's address > 4604 B Pinecrest (Office Pk Dr		Phone r	10 (703) 35	4-7750	
_A	dd. 118	Alexandria, VA 22	312					
		The second secon	shown above? (see instructions) .	The CLASS OF	5.60 6.41		VV	es 🗆 No

-				IIIICII CO		
-	Check it scriedule o contains a response or note to any line in this Part III. Briefly describe the organization's mission	ains a response or 's mission	note to a	ny line in this Par iii	-	- - - - -
HE /	THE ALLIANCE'S PURPOSES OF ORGANIZATION ARE TO ENSURE THAT GOVERNMENT DIRECTIVES AND POLICIES FOR FLOUROCARBONS ARE REASONABLY SOUND AND ECONOMICALLY AND TECHNICALLY EFFECTIVE, TO COOPERATE WITH AND ASSIST GOVERNMENTAL BODIES WITH RESPECT TO SUCH DIRECTIVES AND POLICIES AND TO MAINTAIN AN AWARENESS AMONG MEMBERS OF LEGISLATIVE, REGULATORY, SCIENTIFIC AND OTHER AREAS RELEVANT TO REGULATION OF FLOUROCARBONS THE ABOVE EXEMPT FUNCTION INCOME MEETS THESE PURPOSES	VIZATION ARE TO ALLY AND TECHNI POLICIES AND TO I	ENSURE T CALLY EFF MAINTAIN ROCARBO	HAT GOVERNMENT DIR ECTIVE, TO COOPERAT AN AWARENESS AMON INS THE ABOVE EXEME	GOVERNMENT DIRECTIVES AND POLICIES FOR FLOUROCARBONS IVE, TO COOPERATE WITH AND ASSIST GOVERNMENTAL BODIES VAWARENESS AMONG MEMBERS OF LEGISLATIVE, REGULATORY, SOTHE ABOVE EXEMPT FUNCTION INCOME MEETS THESE PURPOSES	R FLOUROCARBONS ARE NIMENTAL BODIES WITH F. REGULATORY, SCIENTIFICS THESE PURPOSES
2	Did the organization undertake	any significant proc	ram serv	undertake anv significant program services during the year which were not listed on	ich were not listed on	
		vices on Schedule C			-	. Tyes 🗹 No
т	Did the organization cease conduservices?	ucting, or make sig	gnificant cha	cease conducting, or make significant changes in how it conducts, any program	cts, any program	. Tyes 🗹 No
4	If "Yes," describe these changes on Schedule O Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported	on Schedule O ram service accom I organizations are or each program s	iplishmeni required ervice rep	is for each of its three l to report the amount of orted	argest program services, as grants and allocations to of	measured by expenses hers, the total
4a	(Code) (Expe See Additional Data) (Expenses \$	337,457	including grants of \$) (Revenue \$	<u></u>
4 b	(Code) (Expo) (Expenses \$	261,843	including grants of \$) (Revenue \$	401,612)
4c	(Code) (Expr) (Expenses \$	261,842	including grants of \$) (Revenue \$	401,613)
4 d	Other program services (Describe in Schedule O (Expenses \$	oe in Schedule O) including grants of \$	grants of \$) (Revenue \$	
40	Total program service expenses	cac Iv	861 142	61		

	Checklist of Required Schedules		Yes	No
1	Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A	1		No
2	Is the organization required to complete Schedule B, Schedule of Contributors (see instructions)?	2		No
3	Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I	3		No
4	Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II	4		
5	Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III	5	Yes	
6	Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I	6		No
7	Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II	7		No
8	Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III	8		No
9	Did the organization report an amount in Part X, line 21 for escrow or custodial account liability, serve as a custodian for amounts not listed in Part X, or provide credit counseling, debt management, credit repair, or debt negotiation services?If "Yes," complete Schedule D, Part IV	9		No
10	Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi-endowments? If "Yes," complete Schedule D, Part V	10		No
11	If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VIII, VIII, IX, or X as applicable			
а	Did the organization report an amount for land, buildings, and equipment in Part X, line 107 If "Yes," complete Schedule D, Part VI	11a		No
b	Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 167 If "Yes," complete Schedule D, Part VII	116		No
c	Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 167 If "Yes," complete Schedule D, Part VIII	11c		No
d	Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX	11d		No
e	Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X	11e		No
f	Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X	11f		No
12a	Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII	12a		No
b	Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional	12b		No
13	Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13		No
14a	Did the organization maintain an office, employees, or agents outside of the United States?	14a	-	No
	Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV	14b		No
15	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV	15		No
16	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16		No
17	Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I(see instructions)	17		No
18	Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II	18		No
19	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a7 If "Yes," complete Schedule G, Part III	19		No
20a	Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H	20a		No
b	If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?	20Ь		
21	Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II	21		No
22	Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III	22		No

	A transport della communication della programma della communication della communicatio		Yes	No
.3	Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? If "Yes," complete Schedule J.	23		No
4a	Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b through 24d and complete Schedule K If "No," go to line 25a	24a		No
b	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?	24b		No
c	Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds?	24c		No
d	Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?	24d		No
ā	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year? If "Yes," complete Schedule L, Part I	25a		1
ь	Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part I	25Ь		
6	Did the organization report any amount on Part X, line 5, 6, or 22 for receivables from or payables to any current or former officers, directors, trustees, key employees, highest compensated employees, or disqualified persons? If "Yes," complete Schedule L, Part II	26		No
7	Did the organization provide a grant or other assistance to an officer, director, trustee, key employee, substantial contributor or employee thereof, a grant selection committee member, or to a 35% controlled entity or family member of any of these persons? If "Yes," complete Schedule L, Part III	27		No
8	Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions)			
a	A current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part IV	28a		No
b	A family member of a current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L,	28b		No
c	An entity of which a current or former officer, director, trustee, or key employee (or a family member thereof) was an officer, director, trustee, or direct or indirect owner? If "Yes," complete Schedule L, Part IV	28c	Yes	
1	Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule M	29		No
	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? If "Yes," complete Schedule M	30		No
	Did the organization liquidate, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, Part I	31		No
2	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete Schedule N, Part II	32		No
	301 7701-2 and 301 7701-3? If "Yes," complete Schedule R, Part I	33		No
1	Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1	34		No
ā	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	35a		No
Ь	If 'Yes' to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2	35b		
5	Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? If "Yes," complete Schedule R, Part V, line 2	36		
7	Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI	37		No
3	Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and 197 Note. All Form 990 filers are required to complete Schedule O	38		No
Pa	Statements Regarding Other IRS Filings and Tax Compliance			
	Check if Schedule O contains a response or note to any line in this Part V			
12	Enter the number reported in Box 3 of Form 1096 Enter -0- if not applicable 1a 3		Yes	No
	Enter the number of Forms W-2G included in line 1a Enter -0- if not applicable 1b 0			
	Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming (gambling) winnings to prize winners?			

Form	990 (2018)				. 17	Page 5
2a	Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return	2a	0			
b	If at least one is reported on line 2a, did the organization file all required federal employ Note. If the sum of lines 1a and 2a is greater than 250, you may be required to e-file (se			26		No
3a	Did the organization have unrelated business gross income of \$1,000 or more during the	e year?	7 7 7	3a		No
b	If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation	in Sch	nedule O	3b		No
	At any time during the calendar year, did the organization have an interest in, or a signal financial account in a foreign country (such as a bank account, securities account, or otherwise) is enter the name of the foreign country.			4a		No
1.5	See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and	d Finar	icial Accounts (FBAR)			
5a	Was the organization a party to a prohibited tax shelter transaction at any time during t	he tax	year?	5a		No
ь	Did any taxable party notify the organization that it was or is a party to a prohibited tax	shelte	r transaction?	5b		No
c	If "Yes," to line 5a or 5b, did the organization file Form 8886-T?	+-:	****	5c		
6a	Does the organization have annual gross receipts that are normally greater than \$100,0 solicit any contributions that were not tax deductible as charitable contributions?		d did the organization	6a	Yes	
b	If "Yes," did the organization include with every solicitation an express statement that so not tax deductible?	uch cor	ntributions or gifts were	6b	Yes	
7	Organizations that may receive deductible contributions under section 170(c).					
а	Did the organization receive a payment in excess of \$75 made partly as a contribution a provided to the payor?	nd par	tly for goods and services	7a		
ь	If "Yes," did the organization notify the donor of the value of the goods or services provi	ded?		7b		
c	Did the organization sell, exchange, or otherwise dispose of tangible personal property f Form 8282?			7c		
d	IF "Yes," indicate the number of Forms 8282 filed during the year	7d				
e	Did the organization receive any funds, directly or indirectly, to pay premiums on a pers	onal be	enefit contract?	7e		
f	Did the organization, during the year, pay premiums, directly or indirectly, on a personal	benef	fit contract?	7f		
g	If the organization received a contribution of qualified intellectual property, did the organized?	nizatioi	n file Form 8899 as	7g		
h	If the organization received a contribution of cars, boats, airplanes, or other vehicles, displayed.			7h		15
8	Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess busines the year?	ss hold	dings at any time during	8		No
9a	Did the sponsoring organization make any taxable distributions under section 4966? .	2.12		9a		No
	Did the sponsoring organization make a distribution to a donor, donor advisor, or related	d perso	n ²	9b		No
10	Section 501(c)(7) organizations. Enter					
а	Initiation fees and capital contributions included on Part VIII, line 12	10a				-
ь	Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities	10b				
11	Section 501(c)(12) organizations. Enter	-	1			
а	Gross income from members or shareholders	11a				
b	Gross income from other sources (Do not net amounts due or paid to other sources against amounts due or received from them)	11b				
327			Today Naha	132.		
	Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 9	90 in l	eu of Form 10417	12a		No
ь	If "Yes," enter the amount of tax-exempt interest received or accrued during the year	12b				
13	Section 501(c)(29) qualified nonprofit health insurance issuers.					
а	Is the organization licensed to issue qualified health plans in more than one state? Note. See the instructions for additional information the organization must report on Sc	hedule	0	13a		No
b	Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans	13b				
c	Enter the amount of reserves on hand	13c	-	1		

14a Did the organization receive any payments for indoor tanning services during the tax year?

b If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O . . .

15 Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess

No

No

No

Form 990 (2018)

14b

15

16

If "Yes," complete Form 4720, Schedule O . . .

Pai	rt VI	Governance, Management, and Disclosure For each "Yes" response to lines 2 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Scheo Check if Schedule O contains a response or note to any line in this Part VI	lule O	See instructions	o" resp	onse to	lines 🗸
Se	ction	A. Governing Body and Management					
			r - 1			Yes	No
1a	Enter	r the number of voting members of the governing body at the end of the tax year	1a	28			0.00
	body	ere are material differences in voting rights among members of the governing , or if the governing body delegated broad authority to an executive committee or ar committee, explain in Schedule O					
b	Enter	r the number of voting members included in line 1a, above, who are independent	1b	28			
2	Did a	any officer, director, trustee, or key employee have a family relationship or a busine er, director, trustee, or key employee?	ss rela	tionship with any other	2		No
3		he organization delegate control over management duties customarily performed b ficers, directors or trustees, or key employees to a management company or other			3	Yes	
4	Did t	he organization make any significant changes to its governing documents since the	prior F	orm 990 was filed? .	4		No
5	Did t	he organization become aware during the year of a significant diversion of the orga	nization	n's assets? .	5		No
6	Did t	he organization have members or stockholders?			6		No
7a	Did t	he organization have members, stockholders, or other persons who had the power ibers of the governing body?	to elect	or appoint one or more	7a		No
b	Are a	ony governance decisions of the organization reserved to (or subject to approval by ons other than the governing body?) memb	ers, stockholders, or	7b		No
8	Did t	he organization contemporaneously document the meetings held or written actions ollowing					
а	The g	governing body?			8a	Yes	
ь		committee with authority to act on behalf of the governing body? , .			8b		No
9		ere any officer, director, trustee, or key employee listed in Part VII, Section A, who nization's mailing address? If "Yes," provide the names and addresses in Schedule (be reached at the	9		No
Se		B. Policies (This Section B requests information about policies not requ			e Code	e.)	
						Yes	No
10a	Did t	he organization have local chapters, branches, or affiliates?		2 2 2 2	10a		No
b		es," did the organization have written policies and procedures governing the activiti branches to ensure their operations are consistent with the organization's exempt p			10b		
11a		the organization provided a complete copy of this Form 990 to all members of its go			11a	Yes	
ь	Desc	ribe in Schedule O the process, if any, used by the organization to review this Form	990				11
12a	Did t	he organization have a written conflict of interest policy? If "No," go to line 13 .			12a	Yes	10
b		officers, directors, or trustees, and key employees required to disclose annually in icts?	terests	that could give rise to	12b	Yes	
c	Did t	he organization regularly and consistently monitor and enforce compliance with the dule O how this was done	policy	If "Yes," describe in	12c	Ýes	
13	Did t	he organization have a written whistleblower policy?		4 4 10 4 4	13	Yes	
14	Did t	he organization have a written document retention and destruction policy?			14	Yes	
15		he process for determining compensation of the following persons include a review ons, comparability data, and contemporaneous substantiation of the deliberation an			1		100
a	The c	organization's CEO, Executive Director, or top management official	(2. 1s.)	1 4	15a		No
ь	Othe	r officers or key employees of the organization	4 6		15b		No
	If "Ye	es" to line 15a or 15b, describe the process in Schedule O (see instructions)					
16a		he organization invest in, contribute assets to, or participate in a joint venture or si ble entity during the year?		rrangement with a	16a		No
b	in joi	es," did the organization follow a written policy or procedure requiring the organizal int venture arrangements under applicable federal tax law, and take steps to safegular with respect to such arrangements?	uard the		16b		
Se	ction	C. Disclosure					
17		the States with which a copy of this Form 990 is required to be filed▶					
18		on 6104 requires an organization to make its Form 1023 (or 1024-A if applicable), available for public inspection. Indicate how you made these available. Check all t					
		Own website 🔲 Another's website 🗹 Upon request 🔲 Other (explain in S	chedule	(0)			
19	Desc	ribe in Schedule O whether (and if so, how) the organization made its governing do y, and financial statements available to the public during the tax year					
20		the name, address, and telephone number of the person who possesses the organ on Fay 2111 WILSON BOULEVARD Arlington, VA 22201 (703) 243-0344	ization	s books and records			

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Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

1a Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.

- List all of the organization's current officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid
 - . List all of the organization's current key employees, if any See instructions for definition of "key employee"
- List the organization's five current highest compensated employees (other than an officer, director, trustee or key employee) who received reportable compensation (Box 5 of Form W-2 and/or Box 7 of Form 1099-MISC) of more than \$100,000 from the organization and any related organizations
- List all of the organization's former officers, key employees, or highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations
- List all of the organization's former directors or trustees that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations

List persons in the following order individual trustees or directors, institutional trustees, officers, key employees, highest compensated employees, and former such persons

(B) Average hours per week (list any hours	than c	one b	o no ox, i an of tor/t	t ch unle ficei	ss per	son	from the from related organization organizations		(F) Estimated amount of other compensation from the
organizations below dotted line)	Individual trustee or director	Institutional Trustee	Officei	Key employee	Highest compensated employee	Former	(W- 2/1099- MISC)	(W- 2/1099- MISC)	organization and related organizations
	*	Ī	×				ū	á	Ó
5 00			.X.				0	0	0
1 00			×				0	0	C
0 00			ж				a	a	C
0 00			×				0	0	-0
			11						
	Average hours per week (list any hours for related organizations below dotted line) 1 00 0 00 5 00 1 00 1 00 0 00 1 00 1 00 1 00	Average hours per week (list any hours for related organizations below dotted line) 1 00 0 00 5 00 1 00 1 00 1 00 1 00 1 00 1 00 1 00	Average hours per week (list any hours for related organizations below dotted line) 1 00 0 00 5 00 1 00 1 00 1 00 1 00 1 00 1 00	Average hours per week (list any hours for related organizations below dotted line) 100 100 100 100 100 100 100 1	Average hours per week (list any hours for related organizations below dotted line) 1 00	Average hours per week (list any hours for related organizations below dotted line) 1 00 1 00 5 00 1 00	Average hours per week (list any hours for related organizations below dotted line) Position (do not check more than one box, unless person is both an officer and a director/trustee) Individual functional institutional insti	Average hours per week (list any hours for related organizations below dotted line) 100 100 100 100 100 100 100 1	Average hours per week (list any hours for related organizations below dotted line) Position (do not check more than one box, unless person is both an officer and a director/trustee) Officer and a director/trustee Officer and a director/trustee

	(A) Name and Title	(B) Average hours per week (list any hours for related	than o	ne b	ox, u in of tor/t	t che		son	(D) Reportable compensation from the organization (W- 2/1099-MISC)	(E) Reportable compensation from related organizations (2/1099-MISC	w-	Estima Estima Estima Emount of compen from organizat	ated of other sation the							
		organizations below dotted line)	Individual trustee or director	Instrubenal Trustee	Officer	ey employee	(e), employee	key employee	key employee	tighest compensated engles ee	nglest compensated	ormer lighest compensated mployee as amployee	Highest compensated employee	ighest compensated imployee ex employee	Former	2/1005 (1150)	2,1032 11130		relat	ed
							Ī													
							1													
c	Sub-Total	to Part VII, Section ding but not limited	A .	Į.	Ų		e) who	rece	elved more than \$10	00,000										
3	Did the organization list any form			ee k	ev e	mali	nvee	or his	nhest compensated	employee on		Yes	No							
4	line 1a? If "Yes," complete Sched For any individual listed on line 1.	ule J for such individ	dual .	•							3		No							
-	organization and related organiza										4		No							
5	Did any person listed on line 1a r services rendered to the organiza									vidual for	5		No							
S	ection B. Independent Contr	actors																		
1	Complete this table for your five I from the organization Report con										mpens	ation								
_	Home are organization report con	(A)	diction.	yeur	CIIG	ing	With C		THE OF GRANZON	(B)	-1	(0	:)							
Alcal	de & Fay	ime and business addre	255						Lobbying & 1	aption of services	-	Compe	578,414							
	Wilson Blvd								Essesying a r	agine.	- 1		3,0,429							
Arlın	gton, VA 22201																			
	K Street NW Suite 800								Advocacy				120,000							
CRA	nington, DC 20005								Communicat	tion	- 1		121,500							
	K Street NW Suite 300 jungton, DC 20006																			
2	Total number of independent contra		not lim	ited	to th	ose	listed	abov	ve) who received mo	ore than \$100,00	00 of									
	compensation from the organization	1 2 3																		

Form 990 (2018) Page 9 Statement of Revenue Part VIII Check if Schedule O contains a response or note to any line in this Part VIII (B) Related or (C) Unrelated (D) Total revenue Revenue business excluded from exempt function revenue tax under sections revenue 512 - 514 1a Federated campaigns . 1a and Other Similar Amounts Contributions, Gifts, Grants b Membership dues . 16 c Fundraising events . 10 d Related organizations e Government grants (contributions) le All other contributions, gifts, grants, and similar amounts not included above g Noncash contributions included in lines 1a - 1f 5 h Total. Add lines 1a-1f Business Code Revenue 803,22 803,22 2a Membership Dues & Assessments Service Program f All other program service revenue 803,225 9 Total. Add lines 2a-2f 3 Investment income (including dividends, interest, and other 111 1.11 similar amounts) 4 Income from investment of tax-exempt bond proceeds (i) Real (II) Personal 6a Gross rents **b** Less rental expenses c Rental income or (loss) d Net rental income or (loss) . . . (i) Securities (II) Other 7a Gross amount from sales of assets other than inventory b Less cost or other basis and sales expenses C Gain or (loss) d Net gain or (loss) 8a Gross income from fundraising events (not including \$ Revenue contributions reported on line 1c) See Part IV, line 18 h b Less direct expenses . . . c Net income or (loss) from fundraising events . Other 9a Gross income from gaming activities See Part IV, line 19 . . . b Less direct expenses . . . b c Net income or (loss) from gaming activities . . 10aGross sales of inventory, less returns and allowances . . b Less cost of goods sold . . c Net income or (loss) from sales of inventory . Miscellaneous Revenue Business Code 11a d All other revenue . Add 126a Add lines 11a-11d 12 Total revenue, See Instructions 803,336 803.33

Form 990 (2018)

Part IX Statement of Functional Expenses
Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A)

Check if Schedule O contains a response or note to any	line in this Part IX .			🗆 .
Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraisingexpenses
Grants and other assistance to domestic organizations and domestic governments See Part IV, line 21	0			
Grants and other assistance to domestic individuals. See Part IV, line 22.	0			
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, line 15 and 16	0			
4 Benefits paid to or for members	0			
5 Compensation of current officers, directors, trustees, and key employees	0			
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)	0			
7 Other salaries and wages	0			
Pension plan accruals and contributions (include section 401 (k) and 403(b) employer contributions)	0			
9 Other employee benefits	0			
10 Payroll taxes	0			
11 Fees for services (non-employees)				
a Management	550,333	440,266	110,067	
b Legal	22,273	17,818	4,455	
c Accounting	7,978	6,382	1,596	
d Lobbying	0			
e Professional fundraising services See Part IV, line 17	0			
f Investment management fees	0			
g Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule 0)	0			
12 Advertising and promotion	D			
13 Office expenses	0			
14 Information technology	0			
15 Royalties	D			
16 Occupancy	0			
17 Travel	33,433	26,746	6,687	
18 Payments of travel or entertainment expenses for any federal, state, or local public officials .	۵			
19 Conferences, conventions, and meetings	D			
20 Interest	0			
21 Payments to affiliates	0			
22 Depreciation, depletion, and amortization	Q			
23 Insurance	0			
24 Other expenses Itemize expenses not covered above (List miscellaneous expenses in line 24e If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O)				
a Kıgalı expenses	337,457	337,457		
b Administrative Expenses	26,316	21,053	5,263	
c Communications	14,147	11,318	2,829	
d Miscellaneous	127	102	25	
e All other expenses	0			
25 Total functional expenses. Add lines 1 through 24e	992,064	861,142	130,922	.0
26 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation Check here ▶ ☐ if following SOP 98-2 (ASC 958-720)				
Fliery liers - The in following 201 ag-1 (W2C a39-150)				

Form	990	(2018)				Page 1
Pa	art X	Balance Sheet	B			
		Check if Schedule O contains a response or n	ote to any line in this Part IX	the area or the		
				(A) Beginning of year		(B) End of year
	1	Cash-non-interest-bearing		362	1	24,369
	2	Savings and temporary cash investments	_	336,952	2	117,910
	3	Pledges and grants receivable, net		-	3	0
	4	Accounts receivable, net			4	6,200
	5	Loans and other receivables from current and trustees, key employees, and highest comper	former officers, directors,			
Assets	6	Part II of Schedule L	alified persons (as defined under tion 4958(c)(3)(B), and tizations of section 501(c)(9)		6	0
SS	8	Inventories for sale or use			8	0
A	9	Prepaid expenses and deferred charges .		868	9	868
	10a	Land, buildings, and equipment cost or other basis Complete Part VI of Schedule D	10a			
	b	Less accumulated depreciation	10b		10c	0
	11	Investments—publicly traded securities ,			11	0
	12	Investments—other securities See Part IV, III	e 11		12	0
	13	Investments-program-related See Part IV, II	ne 11		13	0
	14	Intangible assets			14	0
	15	Other assets See Part IV, line 11			15	0
	16	Total assets.Add lines 1 through 15 (must e	qual line 34)	338,182	16	149,347
	17	Accounts payable and accrued expenses .		107	17	
	18	Grants payable			18	
	19	Deferred revenue	* *		19	
	20	Tax-exempt bond liabilities	CAC 8 7 8		20	
S	21	Escrow or custodial account liability Complete	Part IV of Schedule D		21	
Liabilities	22	Loans and other payables to current and form key employees, highest compensated employ				
ap		persons Complete Part II of Schedule L			22	
-	23	Secured mortgages and notes payable to unre	elated third parties		23	
7	24	Unsecured notes and loans payable to unrelat	ed third parties		24	
١	25	Other liabilities (including federal income tax, and other liabilities not included on lines 17 - Complete Part X of Schedule D			25	
	26	Total liabilities. Add lines 17 through 25 .		107	26	0
Fund Balances	27	Organizations that follow SFAS 117 (ASC complete lines 27 through 29, and lines 3 Unrestricted net assets		338,075	27	149,347
als	28	Temporarily restricted net assets		28		
d B	29	Permanently restricted net assets			29	
5	77.5	Organizations that do not follow SFAS 11	7 (ASC 958).		7	
-		check here D and complete lines 30				
0 5	30	Capital stock or trust principal, or current fund		30		
set	31	Paid-in or capital surplus, or land, building or	equipment fund		31	
Assets or	32	Retained earnings, endowment, accumulated	income, or other funds		32	
Net	33	Total net assets or fund balances		338,075	33	149,347
Z	24	Tabal habilities and habitaness (6 and bullions)	220 402	74	149.347	

Form 990 (2018)

149,347

338,182

Total liabilities and net assets/fund balances .

Part XI Reconcilliation of Net Assets				
Check if Schedule O contains a response or note to any line in this Part XI	to any line in this Part XI , , , , , , , , , ,		ý	
1 Total revenue (must equal Part VIII, column (A), line 12)	*		ю	803,336
2 Total expenses (must equal Part IX, column (A), line 25)	2		6	992,064
3 Revenue less expenses Subtract line 2 from line 1 .	E		-1	-188,728
4 Net assets or fund balances at beginning of year (must equal Part X, line 33)	qual Part X, line 33, column (A))		3	338,075
5 Net unrealized gains (losses) on investments	in			
6 Donated services and use of facilities				
Investment expenses	2			
8 Prior period adjustments				
9 Other changes in net assets or fund balances (explain in Schedule O)	Schedule 0) 9			
10 Net assets or fund balances at end of year Combine lines 3 through 9 (must equal Part X, line 33, column (B))	s 3 through 9 (must equal Part X, line 33, column (B))		1	149,347
Part XII Financial Statements and Reporting				Ir
Check if Schedule O contains a response or note to any line in this Part XII	to any line in this Part XII		1	
			Yes	No
Accounting method used to prepare the Form 990 If the organization changed its method of accounting fror Schedule 0	used to prepare the Form 990 💮 Cash 🗹 Accrual 🗀 Other hanged its method of accounting from a prior year or checked "Other," explain in			
2a Were the organization's financial statements compiled or reviewed by an independent accountant?	reviewed by an independent accountant?	2a		Š
If Yes,' check a box below to indicate whether the financ separate basis, consolidated basis, or both	below to indicate whether the financial statements for the year were compiled or reviewed on a olidated basis, or both			
Separate basis Consolidated basis	☐ Both consolidated and separate basis			
b Were the organization's financial statements audited by an independent accountant?	an independent accountant?	2b		No
If 'Yes,' check a box below to indicate whether the financ consolidated basis, or both	If Yes,' check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both	18		þ.
Separate basis Consolidated basis	☐ Both consolidated and separate basis			
 If "Yes," to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant? 	2b, does the organization have a committee that assumes responsibility for oversight or compilation of its financial statements and selection of an independent accountant?	20		
If the organization changed either its oversight process o	hanged either its oversight process or selection process during the tax year, explain in Schedule O	0		
3a As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133?	ired to undergo an audit or audits as set forth in the Single	3a		No
 If "Yes," did the organization undergo the required audit or audits? If the organization did not un audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits. 	If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits.	34		

Additional Data

Software ID: 18007218 Software Version: 2018v3.1

EIN: 52-1207922

Name: ALLIANCE FOR RESPONSIBLE ATMOSPHERIC POLICY INC

Form 990 (2018)

Form 990, Part III, Line 4a:

Kigali treaty ratification - Includes economic study, outside lobbyist and communications firm

Form 990, Part III, Line 4b: REGULATORY ACTION PROGRAM--PREPARATION OF COMMENTS IN ORDER TO EDUCATE AND KEEP REGULATORY OFFICIALS AND BODIES INFORMED ABOUT FLOUROCARBON ISSUES AT STATE/LOCAL LEVELS

Form 990, Part III, Line 4c: CONFERENCES AND METINGS - COMMUNICATION TO MEMBERS, PUBLIC AND MEDIA ON ISSUES RELATED TO FLOUROCARBONS

efile GRAPHIC print - DO NOT PROCESS | As Filed Data -

DLN: 93493273008449

SCHEDULE C (Form 990 or 990-

Political Campaign and Lobbying Activities

For Organizations Exempt From Income Tax Under section 501(c) and section 527

OMB No 1545-0047

EZ)		. o. o.gamead	one Exemper roll moonie	an origin bootion	. se ite/ and section of	2010
Depa	rtment of the Treasury nal Revenue Service		organization is described bel www.irs.gov/Form990 for inst			Open to Public Inspection
If the	Section 501(c)(3) or Section 501(c) (oth Section 527 organi e organization and Section 501(c)(3) of Section 501(c)(3) of e organization and xy Tax) (see sepa	ganizations Completer than section 501(zations Complete P swered "Yes" on Forganizations that had organizations that had swered "Yes" on Forate instructions),	orm 990, Part IV, Line 4, or Fori ve filed Form 5768 (election und ve NOT filed Form 5768 (election orm 990, Part IV, Line 5 (Proxy	lete Part I-C arts I-A and C below n 990-EZ, Part VI, II er section 501(h)) C n under section 501(l	ne 47 (Lobbying Activitie omplete Part II-A Do not on) Omplete Part II-B Do	es), then complete Part II-B o not complete Part II-A
Na	me of the organization in the control of the organization in the control of the c	tion	on Somplete Fart III	7	Employer ide 52-1207922	entification number
Par	t I-A Comple	te if the organiz	ation is exempt under sec	tion 501(c) or is		ization.
1		tion of the organiza	tion's direct and indirect political			
2	1000 Commence of the commence		res (see instructions)			5
3			n activities (see instructions)			
Par			ation is exempt under sec	tion 501(c)(3).		
1			ncurred by the organization unde		- 6	4
2			ncurred by organization manager			\$
3			4955 tax, did it file Form 4720 f		199	T
4a	Was a correction		1222 347, 414 (5 100 1 0111) 1/20)	or 11112 / Cut		☐ Yes ☐ No
ь	If "Yes," describe	n Part IV				100-100-100-100-1102
Pai			ation is exempt under sec	tion 501(c), exc	ept section 501(c)(3).
1	Enter the amoun	t directly expended	by the filing organization for sect	ion 527 exempt fund	tion activities	\$
2		t of the filing organi	zation's funds contributed to other			\$
3	Total exempt fun	ction expenditures	Add lines 1 and 2 Enter here and	d on Form 1120-POL	, line 17b	\$
4	Did the filing org	anization file Form	1120-POL for this year?			☐ Yes ☑ No
5	organization mad of political contri	le payments. For ea butions received tha	oloyer identification number (EIN ch organization listed, enter the t were promptly and directly deli PAC) If additional space is need	amount paid from the vered to a separate i	e filing organization's fund political organization, such	nich the filing is Also enter the amount
	(a) Nam	ne	(b) Address	(c) EIN	(d) Amount paid from filing organization's funds If none, enter -0-	(e) Amount of political contributions received and promptly and directly delivered to a separate political organization. If none, enter -0-
1						
2						
3						
4						
5						
6			Laura Car Salar Sila			-
For F	Paperwork Reductio	n Act Notice, see the	instructions for Form 990 or 990-	Z. Ca	t No 500845 Schedule C	(Form 990 or 990-EZ) 2018

Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)). A Check	Sche	edule C (Form 990 or 990-EZ) 2018						Page 2
## Check	Pa		n is exempt ı	ınder secti	on 501(c)(3)	and filed F	orm 5768 (ele	
Limits on Lobbying Expenditures (The term "expenditures" means amounts paid or incurred.) 1a Total lobbying expenditures to influence public opinion (grass roots lobbying) by Total lobbying expenditures to influence a legislative body (direct lobbying) c Total lobbying expenditures (add lines 1a and 1b) d) Other exempt purpose expenditures e Total exempt purpose expenditures (add lines 1a and 1d) f lobbying nontaxable amount Enter the amount from the following table in both columns If the amount on line 1e, column (a) or (b) is: If the amount on line	A				in Part IV each a	ffiliated grou	p member's name,	address, EIN,
Limits on Lobbying Expenditures (The term "expenditures" means amounts paid or incurred.) 1a Total lobbying expenditures to influence public opinion (grass roots lobbying) b Total lobbying expenditures to influence a legislative body (direct lobbying) c Total lobbying expenditures to influence a legislative body (direct lobbying) c Total lobbying expenditures (add lines 1a and 1b) d Other exempt purpose expenditures d Other exempt purpose expenditures e Total exempt purpose expenditures (add lines 1c and 1d) f Lobbying nontaxable amount. Enter the amount from the following table in both columns If the amount on line 1e, column (a) or (b) is: The lobbying nontaxable amount is: Not over \$500,000 but not over \$1,000,000	В	Check $lacktriangle$ If the filing organization checked	box A and "limi	ted control" p	rovisions apply			
b Total lobbying expenditures (add lines 1a and 1b) Other exempt purpose expenditures (add lines 1c and 1d) Other exempt purpose expenditures (add lines 1c and 1d) I Lobbying nontaxable amount Enter the amount from the following table in both columns If the amount on line 1e, column (a) or (b) is: The lobbying nontaxable amount is: Not over \$500,000 but not over \$1,000,000 Over \$500,000 but not over \$1,000,000 Over \$1,500,000 but not over \$1,500,000 Over \$1,500,000 but not over \$1,500,000 Over \$1,700,000 Over \$1,700,000 S175,000 plus 10% of the excess over \$1,500,000 Over \$1,700,000 Over \$1,700,000 Over \$1,700,000 I Loboy in the excess over \$1,500,000 Over \$1,700,000 Over \$1,70					rred.)	1	organization's	(b) Affiliated group totals
Total lobbying expenditures (add lines 1a and 1b) d Other exempt purpose expenditures Total exempt purpose expenditures (add lines 1c and 1d) f Lobbying nontaxable amount. Enter the amount from the following table in both columns If the amount on line 1e, column (a) or (b) is: The lobbying nontaxable amount is: Not over \$500,000 Deer \$500,000 Deer \$500,000 but not over \$1,000,000 Deer \$1,000,000 but not over \$1,000,000 Deer \$1,000,000 but not over \$1,000,000 Deer \$1,000,000 G Grassroots nontaxable amount (enter 25% of line 1f) Subtract line 1g from line 1a if zero or less, enter -0- i Subtract line 1g from line 1c if zero or less, enter -0- j If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting yes cloud in 4911 tax for this year? 4-Year Averaging Period Under section 501(h) (Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the separate instructions for lines 2a through 2f.) Lobbying Expenditures During 4-Year Averaging Period Calendar year (or fiscal year beginning in) (a) 2015 (b) 2016 (c) 2017 (d) 2018 (e) Total lobbying ceiling amount (150% of line 2a, column(e)) c Total lobbying expenditures d Grassroots nontaxable amount e Grassroots ceiling amount	1a	Total lobbying expenditures to influence public	opinion (grass r	oots lobbying	1			
d Other exempt purpose expenditures Total exempt purpose expenditures (add lines 1c and 1d) [Lobbying nontaxable amount Enter the amount from the following table in both columns If the amount on line 1e, column (a) or (b) is: The lobbying nontaxable amount is: Not over \$500,000 Over \$500,000 but not over \$1,000,000 Over \$500,000 but not over \$1,000,000 Over \$1,000,000 Over \$1,000,0	b	Total lobbying expenditures to influence a legis	slative body (dire	ect lobbying)				
Total exempt purpose expenditures (add lines 1c and 1d) f Lobbying nontaxable amount Enter the amount from the following table in both columns If the amount on line 1e, column (a) or (b) is: The lobbying nontaxable amount is: Not over \$500,000 Over \$500,000 Over \$500,000 Over \$500,000 Over \$500,000 but not over \$1,000,000 Over \$1,500,000 but not over \$1,500,000 Over \$1,500,000 but not over \$1,500,000 Over \$1,500,000 but not over \$1,500,000 Over \$1,500,000 but not over \$1,000,000 Over \$1,500,000 but not over \$1,000,000 Over \$1,500,000 but not over \$1,500,000 S1,500,000 S1,500,000 S1,500,000 S1,500,000 S1,500,000 S1,000,000 S1,500,000	c	Total lobbying expenditures (add lines 1a and	16)					
Formula Lobbying nontaxable amount Enter the amount from the following table in both columns If the amount on line 1e, column (a) or (b) is: The lobbying nontaxable amount is:	d	Other exempt purpose expenditures				19		
columns If the amount on line 1e, column (a) or (b) is: The lobbying nontaxable amount is: Not over \$500,000 Over \$500,000 but not over \$1,000,000 S100,000 plus 15% of the excess over \$500,000 Over \$1,500,000 but not over \$1,500,000 Over \$1,500,000 but not over \$1,500,000 Over \$17,000,000 Over \$17,000,000 Over \$17,000,000 Over \$17,000,000 Over \$17,000,000 S125,000 plus 5% of the excess over \$1,500,000 Over \$17,000,000 Over \$17,000,000 Over \$17,000,000 S125,000 plus 5% of the excess over \$1,500,000 Over \$17,000,000 Over \$17,000,000 Over \$17,000,000 S125,000 plus 5% of the excess over \$1,500,000 Over \$17,000,000 Over \$1,500,000 but not over \$1,500,000 Over \$1	e	Total exempt purpose expenditures (add lines	1c and 1d)					
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Over \$1,500,000 but not over \$17,000,000 See See See See See See See See See Se		Over \$500,000 but not over \$1,000,000	\$100,000 p	lus 15% of the	excess over \$500,00	0		
Over \$17,000,000		Over \$1,000,000 but not over \$1,500,000	s175,000 p	lus 10% of the	excess over \$1,000,0	000		
g Grassroots nontaxable amount (enter 25% of line 1f) h Subtract line 1g from line 1a If zero or less, enter -0- i Subtract line 1f from line 1c If zero or less, enter -0- j If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year? 4-Year Averaging Period Under section 501(h) (Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the separate instructions for lines 2a through 2f.) Lobbying Expenditures During 4-Year Averaging Period Calendar year (or fiscal year beginning in) Calendar year (or fiscal year beginning in) (a) 2015 (b) 2016 (c) 2017 (d) 2018 (e) Total lobbying celling amount (150% of line 2a, column(e)) c Total lobbying expenditures d Grassroots nontaxable amount e Grassroots celling amount		Over \$1,500,000 but not over \$17,000,000	\$225,000 p	lus 5% of the e	cess over \$1,500,00	00		
h Subtract line 1g from line 1a If zero or less, enter -0- i Subtract line 1f from line 1c If zero or less, enter -0- j If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year? 4-Year Averaging Period Under section 501(h) (Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the separate instructions for lines 2a through 2f.) Lobbying Expenditures During 4-Year Averaging Period Calendar year (or fiscal year beginning in) (a) 2015 (b) 2016 (c) 2017 (d) 2018 (e) Total Lobbying ceiling amount (150% of line 2a, column(e)) c Total lobbying expenditures d Grassroots nontaxable amount e Grassroots ceiling amount		Over \$17,000,000	\$1,000,000					
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Calendar year (or fiscal year beginning in) (a) 2015 (b) 2016 (c) 2017 (d) 2018 (e) Total Lobbying nontaxable amount (150% of line 2a, column(e)) c Total lobbying expenditures d Grassroots nontaxable amount e Grassroots ceiling amount	_			4 - 1 - 1 - 1		San sans	gh 2f.)	
beginning in) (a) 2015 (b) 2016 (c) 2017 (d) 2018 (e) 161 2a Lobbying nontaxable amount (150% of line 2a, column(e)) c Total lobbying expenditures d Grassroots nontaxable amount e Grassroots ceiling amount	_	Lobbying	Expenditure	5 During 4-	Tear Averagii	ig Period		1
b Lobbying ceiling amount (150% of line 2a, column(e)) c Total lobbying expenditures d Grassroots nontaxable amount e Grassroots ceiling amount				(a) 2015	(b) 2016	(c) 2017	(d) 2018	(e) Total
(150% of line 2a, column(e)) c Total lobbying expenditures d Grassroots nontaxable amount e Grassroots ceiling amount	2a	Lobbying nontaxable amount						
d Grassroots nontaxable amount e Grassroots ceiling amount	b							
e Grassroots ceiling amount	С	Total lobbying expenditures						
	d	Grassroots nontaxable amount						
	e	Grassroots ceiling amount (150% of line 2d, column (e))						
f Grassroots lobbying expenditures Schedule C (Form 990 or 990-EZ)	f	Grassroots lobbying expenditures				Saha	dule C (Form 90)	or 990-F7) 2019

For	each "Yes" response on lines 1a through 1i below, provide in Part IV a detailed description of the lobbying	(a)		(b)
activ		Yes	No	Amo	unt
1	During the year, did the filing organization attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of		11		
а	Volunteers?				
b	Paid staff or management (include compensation in expenses reported on lines 1c through 1i)?	10 - 1			
c	Media advertisements?				
d	Mailings to members, legislators, or the public?				
e	Publications, or published or broadcast statements?				
f	Grants to other organizations for lobbying purposes?				
g	Direct contact with legislators, their staffs, government officials, or a legislative body?				
h	Rallies, demonstrations, seminars, conventions, speeches, lectures, or any similar means?				
Ĩ.	Other activities?				
j	Total Add lines 1c through 1i				
2a	Did the activities in line 1 cause the organization to be not described in section 501(c)(3)?				
b	If "Yes," enter the amount of any tax incurred under section 4912				
C	If "Yes," enter the amount of any tax incurred by organization managers under section 4912				
d	If the filing organization incurred a section 4912 tax, did it file Form 4720 for this year?				
Pai	t III-A Complete if the organization is exempt under section 501(c)(4), section 501(c) 501(c)(6).)(5), or	section	n	
	man and a second		-	Yes	1
1	Were substantially all (90% or more) dues received nondeductible by members?		1		No
2	Did the organization make only in-house lobbying expenditures of \$2,000 or less?		2		No
3	Did the organization agree to carry over lobbying and political expenditures from the prior year?	Jan .		91	No
Pai	t III-B Complete if the organization is exempt under section 501(c)(4), section 501(c) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Part answered "Yes."				c)(6)
1	Dues, assessments and similar amounts from members	1		8	303,225
2	Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid).	ارقا			
а	Current year	2a		2	290,000
ь	Carryover from last year	2b			
c	Total	2c			290,000
3	Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues	3		4	01,612
4	If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess does the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year?	4			
5	Taxable amount of lobbying and political expenditures (see instructions)	5			
P	art IV Supplemental Information				

Provide the descriptions required for Part I-A, line 1, Part I-B, line 4, Part I-C, line 5, Part II-A (affiliated group list), Part II-A, lines 1 and 2 (see

Influencing government policies affecting Chloroflourocarbons

Explanation

instructions), and Part II-B, line 1 Also, complete this part for any additional information

Part II-B Complete if the organization is exempt under section 501(c)(3) and has NOT filed

Schedule C (Form 990 or 990EZ) 2018

Return Reference

Part I-A, Line 1 - Direct and Indirect Political Campaign Activities

efile GRAPHIC	print - DO NO	T PROCES	S As F	iled Data -					DL	N: 93	4932	7300	8449
chedule L orm 990 or 990	-EZ) ► Complet	te if the orga	nization a	ns with Ir inswered "Yes 3c, or Form 99 th to Form 990	" on Form 9: 0-EZ, Part V	90, Part IV, li , line 38a or 4	nes 2	5a, 2	5b, 26	, _	2 (22	
		▶Go to	www.irs	gov/Form990	for the late:	st informatio	n.				-		
partment of the Treaternal Revenue Servi	V 7.0 M 1000)pen Inst	to Pu Sectio	
Name of the orga ALLIANCE FOR RES POLICY INC	anization PONSIBLE ATMOSPHI	ERIC						nploy -120	er ide 7922	ntifica	tion n	umbe	r
	ss Benefit Trar ete if the organiza									e 40h			
) Name of disquali			Relationship be				(c) D	escript	ion of	-) Corr	ected?
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	_						1						
			- 4										
Part II Loa	ans to and/or I	y, on line 2, a From Inter ization answe	ested Per	rsons. n Form 990-EZ,	rganization .	0.00					the org	janizat	tion
Part II Loa Con repo (a) Name of	ns to and/or I	From Interization answern Form 990, I	ested Per red "Yes" o Part X, line (d) Loan	rsons. n Form 990-EZ, 5, 6, or 22	rganization .			t IV,		, or if t	(janizat i)Writi ireems	ten
Part II Loa Con report (a) Name of	ans to and/or I nplete if the organ orted an amount o (b) Relationship	From Interization answern Form 990, I	ested Per red "Yes" o Part X, line (d) Loan	rsons. n Form 990-EZ, 5, 6, or 22 to or from the	Part V, line 3	8a, or Form 99	00, Par	t IV,	line 26 (h Approx	, or if t	(i)Writt Ireeme	ten
Part II Loa Con report (a) Name of	ans to and/or I nplete if the organ orted an amount o (b) Relationship	From Interization answern Form 990, I	ested Per red "Yes" o Part X, line (d) Loan orga	rsons. n Form 990-EZ, 5, 6, or 22 to or from the nization?	Part V, line 3	8a, or Form 99	(g) defa	t IV, In ult?	Ine 26 (h Approx boar comm	, or if to	(ag	i)Writt Ireeme	ten ent?
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Part II Loa Con repr (a) Name of iterested person	ans to and/or I nplete if the organ orted an amount o (b) Relationship	y, on line 2, a From Inter ization answe n Form 990, I (c) Purpose	ested Per red "Yes" o Part X, line (d) Loan orga	rsons. n Form 990-EZ, 5, 6, or 22 to or from the nization?	Part V, line 3 (e)Original principal amount	8a, or Form 99	(g) defa	t IV, In ult?	Ine 26 (h Approx boar comm	, or if to	(ag	i)Writt Ireeme	ten ent7
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Part II Loa Com repr (a) Name of sterested person	ans to and/or I nplete if the organ orted an amount o (b) Relationship	y, on line 2, a From Inter ization answe n Form 990, I (c) Purpose	ested Per red "Yes" o Part X, line (d) Loan orga	rsons. n Form 990-EZ, 5, 6, or 22 to or from the nization?	Part V, line 3 (e)Original principal amount	8a, or Form 99	(g) defa	t IV, In ult?	Ine 26 (h Approx boar comm	, or if to	(ag	i)Writt Ireeme	ten ent7
Part II Loa Compression (a) Name of terested person	ans to and/or Inplete if the organizated an amount of (b) Relationship with organization	y, on line 2, a From Inter Ization answe n Form 990, I (c) Purpose of loan	ested Per red "Yes" o Part X, line (d) Loan orga	ested Persoi	Part V, line 3 (e)Original principal amount	8a, or Form 99	(g) defa	t IV, In ult?	Ine 26 (h Approx boar comm	, or if to	(ag	i)Writt Ireeme	ten ent7
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Part II Loa Con repr (a) Name of interested person	nns to and/or Inplete if the organ orted an amount of (b) Relationship with organization with organization of the organization	rce Benefit anization answer n Form 990, I (c) Purpose of loan	ested Pered "Yes" of Part X, line (d) Loan orgation To in the swered "Yes" of between n and the	ested Person es" on Form 9	Part V, line 3 (e)Original principal amount **Sample of the state of	8a, or Form 99 (f)Balance due	(g) defa	t IV, In ult?	line 26 (h Approv boar comm Yes	, or If to	Yes	i)Writt	ten ent₹
Part III Loa Con repr (a) Name of interested person	nns to and/or Inplete if the organ orted an amount of (b) Relationship with organization with organization of the organization	rce Benefit anization answer n Form 990, I (c) Purpose of loan	ested Pered "Yes" of Part X, line (d) Loan orgation To in the swered "Yes" of between n and the	ested Person es" on Form 9	Part V, line 3 (e)Original principal amount **Sample of the state of	8a, or Form 99 (f)Balance due	(g) defa	t IV, In ult?	line 26 (h Approv boar comm Yes	, or If to	Yes	i)Writt	ten ent₹

Add. 137a

2018	
990-EZ)	
990 or 9	
(Form 9	
Schedule L	

28c.	
28b, or	
ne 28a,	
art IV, lı	
sons. n 990, P	
Iving Interested Persiswered "Yes" on Forn	
Part IV Business Transactions Involving Interested Persons. Complete if the organization answered "Yes" on Form 990, Part IV, line 28a, 28b, or 28c.	
Busin Compl	
Part IV	

	laring	ation's	ues?	٥N	No			
	ਮੁਤ (ə)	organization's	revenues?	Yes				
1, 200, 01 20C.	(d) Description of transaction (e) Sharing				578,414 Lobbying & Mgt			
1 220, Fait IV, IIIE 209	(c) Amount of	נומוואמרוווו			578,414			
IISWEIEU IES UII FUIII	(b) Relationship	person and the	organization		Director			
Colliplete II tile olganization answeled Tes On Follin 330, Falt IV, IIIle 20a, 20b, Ol 20t.	(a) Name of interested person				(1) Alcalde & Fay			

Supplemental InformationProvide additional information for responses to questions on Schedule L (see instructions)

Explanation Return Reference

Schedule L (Form 990 or 990-EZ) 2018

etile GRAPH	efile GRAPHIC print - DO NOT PROCESS As Filed Data -	DLN: 93493273008449
SCHEDULE O (Form 990 or 990-	E O Supplemental Information to Form 990 or 990-EZ	90-EZ OMB No 1545-0047
EZ)	Form 990 or 990-EZ or to provide any additional information. ▶ Attach to Form 990 or 990-EZ.	
Department of the Treasur	► Go to <u>www</u>	Inspection
Marmel Betheropganization	aMzation poniciai e atmocement	Employer identification number
POLICY INC		52-1207922
990 Scheduk	990 Schedule O, Supplemental Information	•
Return Reference	Explanation	
Form 990, Part VI, Line	Day-to-Day Operations directed by management company	
Description of Delegated		
Management Company		

990 Schedule O, Supplemental Information

990 Schedule O, Supplemental Information

Return Reference	Explanation
Form 990, Part VI, Line 19 Other Organization Documents Publicly	No documents available to the public

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Research Tax-Exempt Organizations

ALLIANCE FOR RESPONSIBLE CFC POLICY INC

ARLINGTON, VA 22201-3051 TAX-EXEMPT SINCE FEB. 1981

Full text of "Full Filing" for fiscal year ending Dec. 2019

Tax returns filed by nonprofit organizations are public records. The Internal Revenue Service releases them in two formats: page images and raw data in XML. The raw data is more useful, especially to researchers, because it can be extracted and analyzed more easily. The pages below are a reconstruction of a tax document using raw data from the IRS.

Source: Data and stylesheets from the Internal Revenue Service. E-file viewer adapted from IRS e-File Viewer by Ben Getson.

← Back to main page for ALLIANCE FOR RESPONSIBLE CFC POLICY INC

Jump to	Schedule:	Form 990

efile Public Visual Render

ObjectId: 202033219349301328 - Submission: 2020-11-16

Form **990**

Return of Organization Exempt From Income Tax

₩,

Department of the Treasury Internal Revenue Service Under section 501(c), 527, or 4947(a) (1) of the Internal Revenue Code (except private fou

▶ Do not enter social security numbers on this form as it may be made public.

► Go to <u>www.irs.gov/Form990</u> for instructions and the latest information.

Λ E	or th	o 2010 c	 alendar year, or tax year beginning 01-01-2019 , and endir	ag 12-21	-2010	
		applicable:	C Name of organization ALLIANCE FOR RESPONSIBLE ATMOSPHERIC	ig 12-31	1-2019	D Em
			52-			
O Na	ıme ch	nange	POLICY INC			
	itial re		Doing business as			
_		n/terminated d return	Number and street (or P.O. box if mail is not delivered to street address)	Room/sui	to	E Tele
		on pending	2111 WILSON BOULEVARD	ROOIII/Sui	le	(70
			City or town, state or province, country, and ZIP or foreign postal code			
			ARLINGTON, VA 22201			G Gro
			F Name and address of principal officer:		H(a)	Is this a grou
			Kevin Fay 2111 WILSON BOULEVARD 850			subordinates'
			ARLINGTON, VA 222013051		H(b)	Are all subord
I Ta	x-exei	mpt status:	☐ 501(c)(3) ☑ 501(c) (6) ◄ (insert no.) ☐ 4947(a)(1) or ☐	527		included? If "No," attac
JW	ebsi	te: ww	w.arap.org		H(c)	Group exemp
K Form	n of o	rganization:	✓ Corporation ☐ Trust ☐ Association ☐ Other ►		L Year	of formation: 19
Pa	art I		mary			
		See Part I	scribe the organization's mission or most significant activities:			
9						
пa						
Governance	2	Check thi				
ŝ	3		of voting members of the governing body (Part VI, line 1a)			
×8	4	Number o	of independent voting members of the governing body (Part VI, line	e 1b) .		
Activities &	5	Total nun	nber of individuals employed in calendar year 2019 (Part V, line 2a))		
Ž	6		nber of volunteers (estimate if necessary)			
Act	7a		elated business revenue from Part VIII, column (C), line 12			
			ated business taxable income from Form 990-T, line 39			
			<u> </u>			Prior Yea
_	8	Contribut	ions and grants (Part VIII, line 1h)			
	9		service revenue (Part VIII, line 2g)			
Revenue		-	nt income (Part VIII, column (A), lines 3, 4, and 7d)	_		
ď	11		renue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)			
			enue—add lines 8 through 11 (must equal Part VIII, column (A), line	e 12)		{
	+		nd similar amounts paid (Part IX, column (A), lines 1–3)	•		
			paid to or for members (Part IX, column (A), line 4)			
			other compensation, employee benefits (Part IX, column (A), lines	· 5 10)		

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Expense:	16			ζ, colum	nn (A), line 11e)					
20	b	Total fur	ndraising expenses (Part IX, colum	nn (D), lir	ne 25) > 0					
酉					1a–11d, 11f–24e)		Ç			
	18 Total expenses. Add lines 13–17 (must equal Part IX, column (A), line 25)									
			ue less expenses. Subtract line	•			-1			
Pro Publi	ıca		·			Begi	nning of Curre			
ProPubli										
The Data	≥ 6	ore Total as	ssets (Part X, line 16)				1			
Topics	21	Total lia	abilities (Part X, line 26)							
Ser 25		Net ass	sets or fund balances. Subtract	t line 2	1 from line 20		1			
News Ap	art II		nature Block							
Imbaew	ledge now	e and be ledge.	lief, it is true, correct, and con	mplete.	ned this return, including accompanyin Declaration of preparer (other than of	ficer) is ba	2020-11-16			
Sign About U Here		Sign	nature of officer				Date			
Here Board a		dvi Kevi	n Fay Executive Director							
Off icers		Stoff	e or print name and title							
		Otan	Print/Type preparer's name		Preparer's signature	Date	Check			
Diversity Paid Jobs and	d d Fel	lowships	.				self-employe			
Reports	par	er	Firm's name FALCORN & CURE	ETON Ltd	d CPAs		Firm's EIN			
Media C	ente	nly	Firm's address 4604 B Pinecres	st Office I	Pk Dr		Phone no. (
Advertis	ing I	Policy	Alexandria, VA	22312						
Codeof	Ethi	RS discu	ss this return with the prepare	er show	n above? (see instructions)					
			Reduction Act Notice, see th			Cat.	No. 11282Y			
Subscrib	he h	v Fmail			——————————————————————————————————————					
Subscrib		•								
Twitter			tomont of Drogram Corn	·ioo Λο	naamaliah maanta					
Faceboo	ok		tement of Program Serv		•					
iOS and	Auro	Chec Irgio Stiv descr	ck if Schedule O contains a res ribe the organization's mission	sponse (or note to any line in this Part III	• •	• • • •			
Podcast	۱۱۱۵ م	ANCE'S P	PURPOSES OF ORGANIZATION	·· ARF TO	D ENSURE THAT GOVERNMENT DIRECT	TIVES AND	POLICIES FC			
REAS	ONA	BLY SOU	IND AND ECONOMICALLY AND) LECHN	IICALLY EFFECTIVE; TO COOPERATE W	VIIH AND A	ASSIST GOVE			
RESP	ECT OTHI	TO SUCE ER AREA:	1 DIRECTIVES AND POLICIES AS RELEVANT TO REGULATION	OF FLO) MAINTAIN AN AWARENESS AMONG N DUROCARBONS. THE ABOVE EXEMPT F	VIEMBERS (UNCTION	OF LEGISLATI INCOME MEE			
Steal Ou										
Contact		01103								
Donate	Did	the orga	anization undertake any signifi	icant pr	ogram services during the year which	were not I	isted on			
Donate	the	prior Fo	rm 990 or 990-EZ?							
			scribe these new services on S							
3	Did	the orga	anization cease conducting, or	makes	significant changes in how it conducts,	, any progr	am			
		vices? .								
	If "	Yes," des	scribe these changes on Sched	dule O.						
4	Sec	ction 501		ations ar	omplishments for each of its three larg re required to report the amount of groported.					

4a	(Code:) (Expenses \$	366,985	including grants of \$) (Revenue s
					EEP REGULATORY OFFICIALS AN
PR	FLOUROCARBON ISSUES AT TO PUBLICA	HE INTERNATIONAL, I	FEDERAL AND ST	ATE/LOCAL LEVELS.	
4b	(Code:) (Expenses \$	122,328	including grants of \$) (Revenue
40	•				JES RELATED TO FLOUROCARBO
	- CONFERENCES AND WEETING	- COMMONICATION	TO MEMBERS, F	OBEIG AND MEDIA ON 1990	TES RELATED TO TEOUROCARDO
 С ө ру	ri ght 2021 Pro Publica Inc.) (Expenses \$	102,000	including grants of \$) (Revenue
	Kigali treaty ratification - Incl	udes economic study,	outside lobbyist	and communications firm.	
4d	Other program services (Doscribo in Schodu	Io (O)		
40	(Expenses \$		uding grants of	\$) (Revenue \$
4e	Total program service	expenses 🟲	591,3	313	
				—— Page 3 ———	
Form	000 (2010)				
	1 990 (2019)				
Pa	art IV Checklist of Re	equired Schedu	ies		
1	Is the organization descri	bed in section 501((c)(3) or 4947((a)(1) (other than a priv	vate foundation)? If "Yes," o
2	Is the organization requir	ed to complete <i>Sch</i>	edule B, Sche	dule of Contributors (se	e instructions)?
3	Did the organization enga for public office? If "Yes,"				half of or in opposition to c
4	Section 501(c)(3) orga				vities, or have a section 501
5					receives membership dues, " complete Schedule C, Par
6					ounts for which donors hav counts?If "Yes," complete
7	Did the organization rece the environment, historic			9	
8	Did the organization mair complete Schedule D, Pa		works of art, h	istorical treasures, or of	ther similar assets? <i>If "Yes,</i>
9		Part X; or provide c	redit <u>co</u> unselir		count liability; serve as a corredit repair, or debt negotion.
10	Did the organization, dire permanent endowments,		-		porarily restricted endowm
11	If the organization's answ or X as applicable.	er to any of the foll	lowing questio	ns is "Yes," then comple	ete Schedule D, Parts VI, V
а	Did the organization repo	rt an amount for la	nd, buildings,	and equipment in Part X	(, line 10? <i>If "Yes," comple</i> :
b	Did the organization repo assets reported in Part X,				line 12 that is 5% or more
С	·	rt an amount for in	vestments—pr	ogram related in Part X	line 13 that is 5% or more
d	Did the organization repo		•		

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	In Part X, line 16? If Yes, complete Schedule D, Part IX ΔΔ
е	Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Pa
f	Did the organization's separate or consolidated financial statements for the tax year include a footnote that ac the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? <i>If "Yes," complete Schedule D,</i>
12a	Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," com Schedule D, Parts XI and XII
b	Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is of
13	Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E
14a	Did the organization maintain an office, employees, or agents outside of the United States?
b	Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraisi business, investment, and program service activities outside the United States, or aggregate foreign investme at \$100,000 or more? <i>If "Yes," complete Schedule F, Parts I and IV </i>
15	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to o foreign organization? If "Yes," complete Schedule F, Parts II and IV
16	Did the organization report on Part IX, column (A), line 3, more than $5,000$ of aggregate grants or other assis or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV
17	Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on I column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I (see instructions)
18	Did the organization report more than \$15,000 total of fundraising event gross income and contributions on P lines 1c and 8a? <i>If "Yes," complete Schedule G, Part II</i>
19	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If complete Schedule G, Part III
20a	Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H
b	If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?
21	Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or do government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II
	Page 4 ———————————————————————————————————
Form	990 (2019)
	**TIV Checklist of Required Schedules (continued)
1 41	Checkist of Required concedures (communes)
22	Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on P column (A), line 2? If "Yes," complete Schedule I, Parts I and III
23	Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization and former officers, directors, trustees, key employees, and highest compensated employees? <i>If "Yes," compl-Schedule J </i>
24a	Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,0 the last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a
b	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?
С	Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds?
d	Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?
25a	Section 501(c)(3) , 501(c)(4) , and 501(c)(29) organizations . Did the organization engage in an excess transaction with a disqualified person during the year? <i>If "Yes," complete Schedule L</i> , Part I

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	<i>Schedule L, Part I</i>
26	Did the organization report any amount on Part X, line 5 or 22 for receivables from or payables to any currer officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity of member of any of these persons? <i>If "Yes," complete Schedule L, Part II</i>
27	Did the organization provide a grant or other assistance to any current or former officer, director, trustee, kee employee, creator or founder, substantial contributor, or employee thereof, a grant selection committee mem 35% controlled entity (including an employee thereof) or family member of any of these persons? <i>If "Yes," of Schedule L,</i> Part III
28	Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part instructions for applicable filing thresholds, conditions, and exceptions):
а	A current or former officer, director, trustee, key employee, creator or founder, or substantial contributor? <i>If</i> complete Schedule L, Part IV
b	A family member of any individual described in line 28a? If "Yes," complete Schedule L, Part IV
С	A 35% controlled entity of one or more individuals and/or organizations described in lines 28a or 28b? If "Ye complete Schedule L, Part IV
29	Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule ${\it M}$.
	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified concontributions? <i>If "Yes," complete Schedule M</i>
31	Did the organization liquidate, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, F
32	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? <i>If "Yes," completed Schedule N, Part II</i>
33	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations 301.7701-2 and 301.7701-3? <i>If "Yes," complete Schedule R, Part I</i>
34	Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III, Part V, line 1
35a	Did the organization have a controlled entity within the meaning of section 512(b)(13)?
b	If 'Yes' to line 35a, did the organization receive any payment from or engage in any transaction with a control within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2
36	Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable reorganization? <i>If "Yes," complete Schedule R, Part V, line 2 </i>
37	Did the organization conduct more than 5% of its activities through an entity that is not a related organization is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI
38	Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and All Form 990 filers are required to complete Schedule O
Par	rt V Statements Regarding Other IRS Filings and Tax Compliance
	Check if Schedule O contains a response or note to any line in this Part V
1a	Enter the number reported in Box 3 of Form 1096. Enter -0- if not applicable 1a
	Enter the number of Forms W-2G included in line 1a. Enter -0- if not applicable . 1b
	Did the organization comply with backup withholding rules for reportable payments to vendors and reportable (gambling) winnings to prize winners?
	(gambing) willings to prize williers.
	Page 5 ———————————————————————————————————
orm	990 (2019)
	* V Statements Degarding Other IDS Filings and Tay Compliance (continued)
Par	rt V Statements Regarding Other IRS Filings and Tax Compliance (continued)

b	If at least one is reported on line 2a, did the organization file all required federal employ Note. If the sum of lines 1a and 2a is greater than 250, you may be required to e-file (
3a	Did the organization have unrelated business gross income of \$1,000 or more during th	e year?						
b	If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation	n in Schedule O						
	At any time during the calendar year, did the organization have an interest in, or a signature or other authority financial account in a foreign country (such as a bank account, securities account, or other financial account)? If "Yes," enter the name of the foreign country:							
	See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank an	d Financial Accounts (I						
5a	Was the organization a party to a prohibited tax shelter transaction at any time during t	the tax year?						
b	Did any taxable party notify the organization that it was or is a party to a prohibited tax	shelter transaction?						
С	If "Yes," to line 5a or 5b, did the organization file Form 8886-T?							
6a	Does the organization have annual gross receipts that are normally greater than \$100,0 solicit any contributions that were not tax deductible as charitable contributions?	000, and did the organi						
b	If "Yes," did the organization include with every solicitation an express statement that s not tax deductible?	uch contributions or gi						
7	Organizations that may receive deductible contributions under section 170(c).							
а	Did the organization receive a payment in excess of \$75 made partly as a contribution a provided to the payor?	and partly for goods an						
b	If "Yes," did the organization notify the donor of the value of the goods or services prov	ided?						
С	Did the organization sell, exchange, or otherwise dispose of tangible personal property Form 8282?	for which it wasrequire						
d	If "Yes," indicate the number of Forms 8282 filed during the year	7d						
е	Did the organization receive any funds, directly or indirectly, to pay premiums on a personal content of the organization receive any funds, directly or indirectly, to pay premiums on a personal content of the organization receive any funds, directly or indirectly, to pay premiums on a personal content of the organization receive any funds, directly or indirectly, to pay premiums on a personal content of the organization receive any funds, directly or indirectly, to pay premiums on a personal content of the organization receive any funds, directly or indirectly, to pay premiums on a personal content of the organization received and the organization received	sonal benefit contract?						
f	Did the organization, during the year, pay premiums, directly or indirectly, on a personal	Il benefit contract? .						
g	If the organization received a contribution of qualified intellectual property, did the organization required?	nization file Form 8899						
h	If the organization received a contribution of cars, boats, airplanes, or other vehicles, d 1098-C?	id the organization file						
8	Sponsoring organizations maintaining donor advised funds. Did a donor advised sponsoring organization have excess business holdings at any time during the year? .	fund maintained by the						
9	Sponsoring organizations maintaining donor advised funds.							
а	Did the sponsoring organization make any taxable distributions under section 4966? .							
b	Did the sponsoring organization make a distribution to a donor, donor advisor, or related	d person?						
10	Section 501(c)(7) organizations. Enter:							
а	Initiation fees and capital contributions included on Part VIII, line 12	10a						
b	Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities	10b						
11	Section 501(c)(12) organizations. Enter:							
а	Gross income from members or shareholders	11a						
b	Gross income from other sources (Do not net amounts due or paid to other sources against amounts due or received from them.)	11b						
12a	Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form	990 in lieu of Form 104						
b	If "Yes," enter the amount of tax-exempt interest received or accrued during the year.	12b						
13	Section 501(c)(29) qualified nonprofit health insurance issuers.							
а	Is the organization licensed to issue qualified health plans in more than one state? . Note. See the instructions for additional information the organization must report on So							
https://proj	Add.:147a of	I I 7						

23/22, 3 D	Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans	13b	Jolica
С	Enter the amount of reserves on hand	13c	
14a	Did the organization receive any payments for indoor tanning services during the tax year	ar? .	· · · ·
b	If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation	n in Sa	chedule O
15	Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000, parachute payment(s) during the year?	000 in •	remuneration c
16	Is the organization an educational institution subject to the section 4968 excise tax on n If "Yes," complete Form 4720, Schedule O.	iet inve	estment income
	Page 6		
Form	990 (2019)		
Par	Governance, Management, and Disclosure For each "Yes" response to lines 2 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Scheol Check if Schedule O contains a response or note to any line in this Part VI.	dule O.	See instruction
Se	ction A. Governing Body and Management		
_		۱	1
1a	Enter the number of voting members of the governing body at the end of the tax year	1a	
	If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain in Schedule O.	,	
b	Enter the number of voting members included in line 1a, above, who are independent	1b	
2	Did any officer, director, trustee, or key employee have a family relationship or a business officer, director, trustee, or key employee?	ss relat	ionship with an
3	Did the organization delegate control over management duties customarily performed by of officers, directors or trustees, or key employees to a management company or other		
4	Did the organization make any significant changes to its governing documents since the	prior F	orm 990 was fi
5	Did the organization become aware during the year of a significant diversion of the organization	nizatio	n's assets? .
6	Did the organization have members or stockholders?		
7a	Did the organization have members, stockholders, or other persons who had the power members of the governing body?	to elec	t or appoint one
b	Are any governance decisions of the organization reserved to (or subject to approval by) persons other than the governing body?) meml	pers, stockholde
8	Did the organization contemporaneously document the meetings held or written actions the following:	undert	aken during the
а	The governing body?		
b	Each committee with authority to act on behalf of the governing body?		
9	Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who conganization's mailing address? If "Yes," provide the names and addresses in Schedule Conganization of the conganization of th		be reached at t
Se	ction B. Policies (This Section B requests information about policies not requ	ıired k	y the Interna
10a	Did the organization have local chapters, branches, or affiliates?		
	If "Yes," did the organization have written policies and procedures governing the activitie and branches to ensure their operations are consistent with the organization's exempt p		
11a	Has the organization provided a complete copy of this Form 990 to all members of its go form?	•	
b	Describe in Schedule O the process, if any, used by the organization to review this Form	990.	
	Did the organization have a written conflict of interest policy? <i>If "No." go to line 13</i> .		

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b	Were officers, directors, or trustees, and conflicts?	key employees r	equired to disclose annually in	terests that could o	jive					
С	Did the organization regularly and consist Schedule O how this was done	stently monitor ar	nd enforce compliance with the	policy? If "Yes, "de	escr					
13	Did the organization have a written whistleblower policy?									
14	Did the organization have a written docu	ıment retention a	nd destruction policy?							
15	Did the process for determining compens persons, comparability data, and contem				dep					
a The organization's CEO, Executive Director, or top management official										
b	Other officers or key employees of the or	rganization .								
	If "Yes" to line 15a or 15b, describe the p	process in Schedu	ule O (see instructions).							
16a	Did the organization invest in, contribute taxable entity during the year?	e assets to, or par		milar arrangement	wit					
b	If "Yes," did the organization follow a wrin joint venture arrangements under app status with respect to such arrangement	olicable federal ta								
Se	ection C. Disclosure									
17	List the states with which a copy of this	Form 990 is requi	red to be filed							
18	Section 6104 requires an organization to only) available for public inspection. Indicate)1(c					
	Own website Another's websit	te 🏻 🗹 Upon rec	juest 🛛 Other (explain in S	chedule O)						
19	Describe in Schedule O whether (and if spolicy, and financial statements available			cuments, conflict o	of in					
20	State the name, address, and telephone •Kevin Fay 2111 WILSON BOULEVARD		erson who possesses the organ 2201 (703) 243-0344	ization's books and	d re					
Form	990 (2019)		—— Page 7							
Pai	Compensation of Officers, and Independent Contract		stees, Key Employees, F	lighest Comper	ารล					
	Check if Schedule O contains a re	esponse or note to	any line in this Part VII							
Se	ection A. Officers, Directors, Trust	tees, Key Emp	loyees, and Highest Con	npensated Emp	olo					
	omplete this table for all persons required	to be listed. Rep	ort compensation for the calend	dar year ending wi	th c					
	List all of the organization's current office mpensation. Enter -0- in columns (D), (E)			rganizations), rega	ırdle					
	ist all of the organization's current key e	. 3								
who i	List the organization's five current highest received reportable compensation (Box 5 on hization and any related organizations.									
	list all of the organization's former officer cortable compensation from the organization			loyees who receive	ed n					
	list all of the organization's former direct nization, more than \$10,000 of reportable									
See i	nstructions for the order in which to list th	ne persons above.								
	Check this box if neither the organization i	nor any related o	ganization compensated any c	urrent officer, direc	ctor					
	Check this box if neither the organization (A) Name and title	(B) Average hours per week (list any hours	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)	(D) Reportable compensation from the	c c					
	(A)	(B) Average hours per week (list	(C) Position (do not check more than one box, unless person is both an officer and a	(D) Reportable compensation	(

	IANCE FOR RESPON	pelow dotted line)	dividual trustee	nstitutional Trustee	flicer		ghest compensated nployee	ormer	IVII 3C)
(1) See Attached Director		0.00	Х						0
(2) Wiliam McQuade Vice Chair		0.00			х				0
(3) Kevin Fay		5.00			х				0
(4) Dave Calabrese Secretary		1.00			Х				0
(5) Nanette Lockwood		1.00			Х				0
Treasurer (6) John Hurst		1.00			Х				0
Chairman		0.00							o d
						_			

—— Page 8 —

Form 990 (2019)

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Em

(A)	(B)	(C)	(D)	
Name and title	Average	Position (do not check more	Reportable	R
	hours per	than one box, unless person	compensation	cor
	week (list	is both an officer and a	from the	frc
	any hours	director/trustee)	organization (W-	orgar
$\Delta dd 150a$	fam malakad	·	2/1000 MICC)	2/1

23/22,	J.04 F WI	ALLIANCE FOR	KLSFONSIBLE CF	CFOLICI	IIVC -	ruii r	iiiig.	- Monbid					
			organizations below dotted line)	Individual trustee or director	Institutional Trustee	Officer	Key employee	Highest compensated employee	Former	2/11	UYY-IVII	SC)	2/1
								_					
C	Sub-Total Total from continuation Total (add lines 1b and							*					
2	Total number of individuo of reportable compensa	uals (including	but not limited	I to thos			bove	e) who	rece	eived n	nore th	an \$10	0,000
3	Did the organization list line 1a? If "Yes," complete	•			ee, ke	ey er	mplo	oyee, d	or hig	ghest c	ompen	sated (emplo •
4	For any individual listed organization and relate individual												the
5	Did any person listed of services rendered to the			•			_			_	zation o	or indiv	vidual •
S	ection B. Independe												
1	Complete this table for from the organization.												
		Name a	(A) and business addr	ess								Descr	(B)
Alcal	de & Fay										Lobby	ying & N	
	Wilson Blvd gton, VA 22201										\perp		
											1		

2 Total number of independent compensation from the organ		ncluding but not limited	d to those listed abov	ve) who received mo	ore tha
Form 000 (2010)			Page 9		
Form 990 (2019)					
Part VIII Statement of R			line in this Dort \/III		
Check ii Schedule	Ocontains a re	sponse or note to any	(A) Total revenue	(B) Related or exempt function revenue	<u>· · ·</u> (
erated campaigns	1a				
mbership dues	1b				
draising events	1c				
ated organizations	1d				
ernment grants (contributions)) <u>1e</u>				
ther contributions, gifts, grant and similar amounts not included above	1f_				
g Noncash contributions included in lines 1a - 1f:\$	1g				
h Total . Add lines 1a-1f		- 0			
		Business Code			
2a Membership Dues & Assessme	ents		702,237	702,237	
even		_			
g:		_			
Serv		-			
Program Service Revenue		_			
f All other program service	revenue.				
9 Total . Add lines 2a–2f.	🕨	702,237	<u>'</u>		
3 Investment income (includ similar amounts)		interest, and other	7,364	7,364	

			▶	0	
5 Royalties		(i) Real	(ii) Personal		
	'ı	()	()		
6a Gross rents	6a				
b Less: rental expenses	6b				
c Rental income or (loss)	6c				
d Net rental incom	ne or (Id	ss)		0	
		(i) Securities	(ii) Other		
7a Gross amount from sales of assets other than inventory	7a				
b Less: cost or other basis and sales expenses	7 b				
c Gain or (loss)	7c				
d Net gain or (loss	S)			0	
(not including \$ contributions report See Part IV, line 18 b Less: direct expe		L	its •	0	
Gross income from See Part IV, line 1	n gamin 9 .	g activities.			
b Less: direct expe		L			
		L	S 	0	
b Less: direct expe c Net income or (lo 10aGross sales of inv returns and allow	ventory, vances	less 10a	5	0	
b Less: direct expec Net income or (lo10aGross sales of inv	ventory, vances	less 10a	S •		
b Less: direct experts the control of the control o	ventory, vances ds sold	less 10a 10b m sales of inventor	y •	0	
b Less: direct expect control of the	ventory, vances ds sold	less 10a 10b m sales of inventor			
b Less: direct experts the control of the control o	ventory, vances ds sold	less 10a 10b m sales of inventor	y •		
b Less: direct expect control of the	ventory, vances ds sold	less 10a 10b m sales of inventor	y •		

12 Total revenue. See instructions .

709,601

709,601

Doo		10
Pac	10	10
1 ac	1~	

Form 990 (2019)

Part IX	Statement of Functional Expenses
	Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must

Check if Schedule O contains a response or note to any line in this Part IX . . . (B) Do not include amounts reported on lines 6b, (A) Program service Manag 7b, 8b, 9b, and 10b of Part VIII. Total expenses expenses gener 0 1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21 2 Grants and other assistance to domestic individuals. See 0 3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 0 4 Benefits paid to or for members. 0 5 Compensation of current officers, directors, trustees, and key 6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B) **7** Other salaries and wages . 0 0 8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions) . . . **9** Other employee benefits . . . 0 **10** Payroll taxes **11** Fees for services (non-employees): 508,363 406,690 a Management . . . 17,962 14,369 **b** Legal . **c** Accounting 1,990 0 **d** Lobbying 0 e Professional fundraising services. See Part IV, line 17 0 **f** Investment management fees . . . 0 **q** Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O) 0 **12** Advertising and promotion . . . 0 **13** Office expenses . **14** Information technology . . . 0 **15** Royalties . 0 0 **16** Occupancy 45,520 36,416 **17** Travel . 0 18 Payments of travel or entertainment expenses for any federal, state, or local public officials 994 994 **19** Conferences, conventions, and meetings . **20** Interest 0 0 **21** Payments to affiliates 0 **22** Depreciation, depletion, and amortization . 0 23 Insurance

24	Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)			
	a Kigali expenses	102,000	102,000	
	b Communications	21,654	17,323	
	c Administrative Expenses	16,898	13,521	
	d			
	e All other expenses	0		
25	Total functional expenses. Add lines 1 through 24e	715,381	591,313	
26	Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here ▶ ☐ if following SOP 98-2 (ASC 958-720).			
				

Page 1	1
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Form 990	(201	9)
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Pa	art X	Balance Sheet				
		Check if Schedule O contains a response or no	te to any line in this Part IX			
				(A) Beginning of year		
	1	Cash-non-interest-bearing		24,369		
	2	Savings and temporary cash investments .	[117,910		
	3	Pledges and grants receivable, net				
	4	Accounts receivable, net	[6,200		
	5	Loans and other payables to any current or forr employee, creator or founder, substantial control or family member of any of these persons				
	6	Loans and other receivables from other disquali section 4958(f)(1)), and persons described in s				
60	7	Notes and loans receivable, net				
et	8	Inventories for sale or use	[
Assets	9	Prepaid expenses and deferred charges	paid expenses and deferred charges			
_	10a	Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D	10a			
	b	Less: accumulated depreciation	10b			
	11	Investments—publicly traded securities .				
	12	Investments—other securities. See Part IV, line	11			
	13	Investments—program-related. See Part IV, line	e 11			
	14	Intangible assets	[
	15	Other assets. See Part IV, line 11	[
	16	Total assets. Add lines 1 through 15 (must eq	ual line 33)	149,347		
	17	Accounts payable and accrued expenses				
	18	Grants payable	Γ			
	10	Deferred revenue	F			

12/23/22,	5:04 P	M ALLIANCE FOR RESPONSIBLE CFC POLICY INC - Full Filing- Nonprofit Explorer - ProPublica	
	20	Tax-exempt bond liabilities	
S	21	Escrow or custodial account liability. Complete Part IV of Schedule D	
Liabilities	22	Loans and other payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons	
Ë	23	Secured mortgages and notes payable to unrelated third parties	
	24	Unsecured notes and loans payable to unrelated third parties	
	25	Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17 - 24). Complete Part X of Schedule D	
	26	Total liabilities. Add lines 17 through 25	С
Net Assets or Fund Balances	27	Organizations that follow FASB ASC 958, check here and complete lines 27, 28, 32, and 33. Net assets without donor restrictions	9,347
9	28	Net assets with donor restrictions	
or Fun	29	Organizations that do not follow FASB ASC 958, check here ▶ □ and complete lines 29 through 33. Capital stock or trust principal, or current funds	
Sts	30	Paid-in or capital surplus, or land, building or equipment fund	
SS	31	Retained earnings, endowment, accumulated income, or other funds	
A A	32	Total net assets or fund balances	9,347
ž	33	Total liabilities and net assets/fund balances	9,347
	- 000	Page 12 ———————————————————————————————————	
	art XI	(2019) Reconcilliation of Net Assets	
Г	ait Ai		
		Check if Schedule O contains a response or note to any line in this Part XI	<u>·</u>
1	Tota	al revenue (must equal Part VIII, column (A), line 12)	
2	Tota	al expenses (must equal Part IX, column (A), line 25)	
3	Rev	venue less expenses. Subtract line 2 from line 1	
4	Net	assets or fund balances at beginning of year (must equal Part X, line 32, column (A))	
5	Net	unrealized gains (losses) on investments	
6	Dor	nated services and use of facilities	
7		estment expenses	
8		or period adjustments	
9		er changes in net assets or fund balances (explain in Schedule O)	(D);
-		assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 32, column	(B)
P	art XII		
		Check if Schedule O contains a response or note to any line in this Part XII	•

	5:04 PM			POLICY INC - Full Filing- Nonprofit Explorer - ProPublica
	If 'Yes,' check a b separate basis, co			ancial statements for the year were compiled or reviewed
	☐ Separate ba	asis	Consolidated basis	☐ Both consolidated and separate basis
b	Were the organiza	ation's finan	cial statements audited l	by an independent accountant?
	If 'Yes,' check a b consolidated basis		indicate whether the find	ancial statements for the year were audited on a separat
	Separate ba	asis	Consolidated basis	☐ Both consolidated and separate basis
С	of the audit, revie	ew, or comp	ilation of its financial sta	a committee that assumes responsibility for oversight tements and selection of an independent accountant? ss or selection process during the tax year, explain in Sch
3а	As a result of a fe Audit Act and OM			equired to undergo an audit or audits as set forth inthe S
b				dit or audits? If the organization did not undergo the reque be any steps taken to undergo such audits.
	990 (2019) Iditional Dat	ta		Software ID: 1000000
			Soci	Software ID : 19009920
			-301	ttware Version: 2019v5 ()
Forn	n 990, Special	Condition		ftware Version: 2019v5.0
Forn	n 990, Special	Condition	Description:	ecial Condition Description
<u>↑ Ba</u>	n 990, Special ck to Top e Public Visual		Description:	
↑ Bacefile	ck to Top e Public Visual HEDULE C		Description: Sp. ObjectId: 202033	ecial Condition Description
↑ Bade efile SCI	ck to Top e Public Visual HEDULE C n 990 or 990-EZ)	Render	ObjectId: 202033	ecial Condition Description 3219349301328 - Submission: 2020-11-16
↑ Badefile SCI (Forr	ck to Top e Public Visual HEDULE C	Render For Orga ▶Complet	ObjectId: 202033 Political Cam anizations Exempt File	ecial Condition Description 3219349301328 - Submission: 2020-11-16 1paign and Lobbying Activities 1rom Income Tax Under section 501(c) and section
efile SCI (Forr DepartrInternal If the SS SS If the (Prox	e Public Visual HEDULE C m 990 or 990-EZ) ment of the Treasury Revenue Service organization ansection 501(c)(3) organization ansection 501(c)(3) organization 501(c)(3) organization 501(c)(3) organization ansection 501(c)(3) organization 501(c)(3) organization 501(c)(3) organization 501(c)(3) organization 501(c)(3) organization 501(c)(3) organization 501(c)(3) o	For Organizations: Consumered "Yest reganizations: Ganizations: Ganiza	ObjectId: 202033 Political Cam anizations Exempt Fi e if the organization is Go to www.irs.gov/Fo s" on Form 990, Part IV, Complete Parts I-A and ion 501(c)(3)) organization plete Part I-A only. s" on Form 990, Part IV, that have filed Form 576 that have NOT filed Form s" on Form 990, Part IV, that have NOT filed Form s" on Form 990, Part IV, thons), then	as 219349301328 - Submission: 2020-11-16 Apaign and Lobbying Activities From Income Tax Under section 501(c) and section Section described below. ► Attach to Form 990 or Form 990 From 990 for instructions and the latest information. Line 3, or Form 990-EZ, Part V, line 46 (Political Cample B. Do not complete Part I-C. Inscreen Complete Parts I-A and C below. Do not complete Part I-A. Do m 5768 (election under section 501(h)): Complete Part II-Line 5 (Proxy Tax) (see separate instructions) or Form
efile SCI (Forr Departr Internal If the Si Si If the (Prox Nan	e Public Visual HEDULE C m 990 or 990-EZ) ment of the Treasury Revenue Service organization ansection 501(c)(3) organization ansection 501(c)(3) organization 501(c)(3) organization 501(c)(3) organization ansection 501(c)(3) organization 501(c)(3) organization 501(c)(3) organization 501(c)(3) organization 501(c)(3) organization 501(c)(3) organization 501(c)(3) o	For Orgate Severed "Yes arganizations: consumered "Yes arganizations arg	ObjectId: 202033 Political Cam anizations Exempt Form Serior Form 990, Part IV, Complete Parts I-A and ion 501(c)(3)) organization plete Part I-A only. That have filed Form 576 that have NOT filed Form 576 that have NOT filed Form 576 that have NOT filed Form 576 that have Serior Form 990, Part IV, it ions), then ganizations: Complete Part I-A on IV.	ecial Condition Description 3219349301328 - Submission: 2020-11-16 apaign and Lobbying Activities rom Income Tax Under section 501(c) and sections adescribed below. ► Attach to Form 990 or Form 990 arm990 for instructions and the latest information. Line 3, or Form 990-EZ, Part V, line 46 (Political Camples) B. Do not complete Part I-C. ons: Complete Parts I-A and C below. Do not complete Part Line 4, or Form 990-EZ, Part VI, line 47 (Lobbying Activities) Significantly the section 501(h)): Complete Part II-A. Do m 5768 (election under section 501(h)): Complete Part II-Line 5 (Proxy Tax) (see separate instructions) or Fore

https://projects.propublica.org/nonprofits/organizations/521207922/202033219349301328/full

complete if the organization is exempt under section 501(c)or is a section 521 or Рап І-А

1	Provide a description of the "political campaign activitie	organization's direct and indirect ps")	political campaign activities in Part	: IV (see instruc				
2		expenditures (see instructions)						
3	Volunteer hours for political campaign activities (see instructions)							
Part		organization is exempt und						
1	Enter the amount of any ex	cise tax incurred by the organization	on under section 4955					
2	Enter the amount of any ex	cise tax incurred by organization n	nanagers under section 4955					
3	If the organization incurred a section 4955 tax, did it file Form 4720 for this year?							
4a	Was a correction made?							
b	If "Yes," describe in Part IV.							
Part	I-C Complete if the	organization is exempt und	ler section 501(c),except s	ection 501(
1		expended by the filing organization	•					
2		ng organization's funds contributed						
3	Total exempt function expe	nditures. Add lines 1 and 2. Enter I	here and on Form 1120-POL, line	17b l				
4	Did the filing organization f	ile Form 1120-POL for this year?.						
5	organization made paymen political contributions receive fund or apolitical action con	s and employer identification numb ts. For eachorganization listed, ent yed that were promptly and directly nmittee (PAC). If additional space i	er the amount paid from the filing ydelivered to a separate political o is needed, provide information in I	organization's rganization, su				
(a)	Name	(b) Address	(c) EIN	(d) Amount p filing organiz funds. If non -0				
1								
2								
3								
4								
5								
6								
For Pa	aperwork Reduction Act Notice	e, see the instructions for Form 990	or 990-EZ. Cat. No. ! — Page 2	50084S Schec				
Sched	dule C (Form 990 or 990-EZ)	2019						
	· · · · · · · · · · · · · · · · · · ·	ne organization isexempt u	nder section 501(c)(3) and	I filed Form				
A C	heck 🕨 🗌 if the filing org	anization belongs to an affiliated g share of excess lobbying expenditu		ated group mei				
B C		anization checked box A and "limit						
		mits on Lobbying Expen		(a orga				

	Calendar year (or fiscal year beginning in)	(a) 2016	(b) 2017	(c) 2018
2a	Lobbying nontaxable amount			
b	Lobbying ceiling amount (150% of line 2a, column(e))			
С	Total lobbying expenditures			
d	Grassroots nontaxable amount			
е	Grassroots ceiling amount (150% of line 2d, column (e))			
f	Grassroots lobbying expenditures			

Page 3

Schedule C (Form 990 or 990-EZ) 2019

Complete if the organization is exempt under section 501(c)(3) and has NOT fi Form 5768 (election under section 501(h)).

For each "Yes" response on lines 1a through 1i below, provide in Part IV a detailed description of the lobbying activity.

Schedule

1		anization attempt to influence foreign, national, state or local legislation, e public opinion on a legislative matter or referendum, through the use of:
а	Volunteers?	
b		e compensation in expenses reported on lines 1c through 1i)?
С	•	
d	Mailings to members, legislators,	or the public?
е	Publications, or published or broad	dcast statements?
f	Grants to other organizations for	lobbying purposes?
g	Direct contact with legislators, the	eir staffs, government officials, or a legislative body?
h	Rallies, demonstrations, seminars	, conventions, speeches, lectures, or any similar means?
i	Other activities?	
j	Total. Add lines 1c through 1i	
2a	Did the activities in line 1 cause the	he organization to be not described in section 501(c)(3)?
b	If "Yes," enter the amount of any	tax incurred under section 4912
С	If "Yes," enter the amount of any	tax incurred by organization managers under section 4912
d	If the filing organization incurred	a section 4912 tax, did it file Form 4720 for this year?
Par	Complete if the or 501(c)(6).	ganization is exempt undersection 501(c)(4), section 501(c)
	7,7,7	
1	Were substantially all (90% or mo	ore) dues received nondeductible by members?
2	Did the organization make only in	-house lobbying expenditures of \$2,000 or less?
3	Did the organization agree to carr	y over lobbying and political expenditures from the prior year?
Par		panization is exempt under section 501(c)(4), section 501(c)) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) I
1	Dues, assessments and similar ar	nounts from members
2	Section 162(e) nondeductible lobber expenses for which the section	bying and political expenditures (do not include amounts of political n 527(f) tax was paid).
a		
b	· · ·	
c		thing (022(a)(1)(A) patient of mondad vatible continue 1(2)(a) dues
3		ction 6033(e)(1)(A) notices of nondeductible section 162(e) dues .
4	the organization agree to carryov	unt on line 2c exceeds the amount on line 3, what portion of the excess does er to the reasonable estimate of nondeductible lobbying and political
5	Taxable amount of lobbying and p	oolitical expenditures (seeinstructions)
Pa	rt IV Supplemental Info	
		art I-A, line 1; Part I-B, line 4; Part I-C, line 5; Part II-A (affiliated group list); o, complete this part for any additional information.
	Return Reference	Explanation
	-A, Line 1 - Direct and Indirect cal Campaign Activities	Influencing government policies affecting Chloroflourocarbons.
		Schedule

Additional Data

Software ID: 19009920 Software Version: 2019v5.0

↑ Back to Top efile Public Visual Render ObjectId: 202033219349301328 - Submission: 2020-11-16 SCHEDULE D Supplemental Financial Statements (Form 990) Complete if the organization answered "Yes," on Form 990, Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b. Department of the Treasury Attach to Form 990. Internal Revenue Service ► Go to www.irs.gov/Form990 for instructions and the latest information. Name of the organization Employer ic ALLIANCE FOR RESPONSIBLE ATMOSPHERIC POLICY INC 52-1207922 Part I Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts. Complete if the organization answered "Yes" on Form 990, Part IV, line 6. (a) Donor advised funds **(b)** Fui 1 2 Aggregate value of contributions to (during year) 3 Aggregate value of grants from (during year) Aggregate value at end of year 4 Did the organization inform all donors and donor advisors in writing that the assets held in donor advised funds ar 5 Did the organization inform all grantees, donors, and donor advisors in writing that grant funds can be used only f charitable purposes and not for the benefit of the donor or donor advisor, or for any other purpose conferring impe Part II Conservation Easements. Complete if the organization answered "Yes" on Form 990, Part IV, line 7. Purpose(s) of conservation easements held by the organization (check all that apply). Preservation of land for public use (e.g., recreation or education) Preservation of an historically im Protection of natural habitat Preservation of a certified histori Preservation of open space 2 Complete lines 2a through 2d if the organization held a qualified conservation contribution in the form of a conserv easement on the last day of the tax year. Held 2a Total acreage restricted by conservation easements 2b b Number of conservation easements on a certified historic structure included in (a) 2c C Number of conservation easements included in (c) acquired after 7/25/06, and not on a historic structure listed in the National Register . . . Number of conservation easements modified, transferred, released, extinguished, or terminated by the organization 3 tax year 🕨 Number of states where property subject to conservation easement is located 4 5 Does the organization have a written policy regarding the periodic monitoring, inspection, handling of violations, Staff and volunteer hours devoted to monitoring, inspecting, handling of violations, and enforcing conservation ear

Does each conservation easement reported on line 2(d) above satisfy the requirements of section 170(h)(4)(B)(i) 8 'Add: 461a'----iba baw the armanization remarks concernation accompants in its revenue and evenues atota

Amount of expenses incurred in monitoring, inspecting, handling of violations, and enforcing conservation easeme

In Part XIII, describe now the organization reports conservation easements in its revenue and expense statement, balance sheet, and include, if applicable, the text of the footnote to the organization's financial statements that de the organization's accounting for conservation easements.

	3 3							
Par	Complete if the organization answ					Other	Similar <i>F</i>	
1a	If the organization elected, as permitted under FASB ASC 958, not to report in its revenue statement and balance historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of publ Part XIII, the text of the footnote to its financial statements that describes these items.							
b	If the organization elected, as permitted under FASB ASC 958, to report in its revenue statement and balance she historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of publ following amounts relating to these items:							
(i) Revenue included on Form 990, Part VIII, lin	e 1					. 🕨 🕏	
(i	i) Assets included in Form 990, Part X						🕨 \$	
2	If the organization received or held works of a following amounts required to be reported und					r financia	ıl gain, pro	
а	Revenue included on Form 990, Part VIII, line	1					🕨 🕏 _	
b	Assets included in Form 990, Part X						🕨 \$	
For F	Paperwork Reduction Act Notice, see the In	nstructions for Fo	rm 990		Cat	. No. 522	283D Sc	
			D 0					
			Page 2					
Sche	dule D (Form 990) 2019							
Par	Organizations Maintaining Col	lections of Art,	Histori	cal Trea	sures, or	Other	Similar <i>F</i>	
3	Using the organization's acquisition, accession items (check all that apply):	n, and other records		any of the	following the	nat are a	significant	
а	Public exhibition		d	O Lo	an or excha	inge prog	ırams	
b	Scholarly research		е	Ot	her			
С	Preservation for future generations							
4	Provide a description of the organization's coll Part XIII.	ections and explain	how the	ey further	the organiz	ation's ex	cempt purp	
5	During the year, did the organization solicit or assets to be sold to raise funds rather than to							
Par	Escrow and Custodial Arrange Complete if the organization answ line 21.		rm 990	, Part IV,	line 9, or	reporte	d an amo	
1a	Is the organization an agent, trustee, custodia included on Form 990, Part X?	an or other interme	diary for	contributi	ons or othe	r assets	not	
b	If "Yes," explain the arrangement in Part XIII	and complete the f	ollowina	table:	Γ			
С	Beginning balance	•	Ü			1c		
d	Additions during the year					1d		
е								
f	Ending balance							
2a	Did the organization include an amount on Fo	rm 990, Part X, line	21, for	escrow or	custodialac	count lial	bility?	
b	If "Yes," explain the arrangement in Part XIII.	Check here if the	explanati	on has be	en provided	l in Part >	(III	
Pa	rt V Endowment Funds.		-		-			
	Complete if the organization answ					nome to a l	(4) The	
1a	Beginning of year balance	(a) Current year	(۵) ⊦	rior year	(c) Two ye	ears back	(d) Three y	
	b Contributions							
	Net investment earnings, gains, and losses				+			

a Grants or scholarships .	ALLIANCE FOR RESPOR	NSIBLE CFC POL	CY INC - Ful	Filing- Nonprofit	=xplorer - ProPublica	
e Other expenditures for facilit	ties					
and programs	1103					
f Administrative expenses .						
g End of year balance						
2 Provide the estimated perc	ـ entage of the currer	nt vear end ba	lance (line	1g column (a)) held as:	
a Board designated or quasi-	-	nt your ond be	narioo (iirio	19, 00141111 (4)	y riola as.	
b Permanent endowment						
c Term endowment						
The percentages on lines 2	a, 2b, and 2c should	d equal 100%				
3a Are there endowment fund organization by:		•		hat are held an	d administered for t	he
(i) Unrelated organizations	5					
(ii) Related organizations						
b If "Yes" on 3a(ii), are the re	elated organizations	s listed as req	uired on Sc	hedule R? .		
4 Describe in Part XIII the in	tended uses of the o	organization's	endowmer	nt funds.		
Part VI Land, Buildings						
Complete if the o		The state of the s				
Description of property	(a) Cost or othe (investmen) Cost or oth	ner basis (other)	(c) Accumulated dep	preciation
1a Land						
b Buildings						
c Leasehold improvements						
d Equipment						
e Other						
Total. Add lines 1a through 1e. ((Column (d) must ed	qual Form 990	, Part X, co	olumn (B), line	10(c).) 🕨	
						Sc
			— Page	3		
Schodulo D (Form 000) 2010						
Schedule D (Form 990) 2019	\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.					
Part VII Investments C Complete if the o			n Form 90	9∩ Part IV lir	ne 11h See Form	990 Pa
*	otion of security or o		7	(b)	Ĭ	Methoc
(inclu	ding name of securi	ty)		Book	Cost o	r end-of-
				value		
(1) Financial derivatives						
(2) Closely-held equity interests(3) Other	•			<u>.</u>		
				_		
(B)						
(C)						
(D)						
(E)						
(F)						
(G)						
(H)						

Total. (Column	n (b) must equal Form 990, Part X, col. (B) line 12.)			
Part VIII	Investments Program Related. Complete if the organization answered 'Yes' on Form 990, Page 1990, P	art IV. li	ne 11c.	See Form 990. Pa
	(a) Description of investment			(b) Book value
(2)				
(3)				
(4)				
(5)				
(6)				
(7)				
(8)				
(9)				
(10)				
Total. (Colum	n (b) must equal Form 990, Part X, col.(B) line 13.)			
Part IX	Other Assets.			
I dit IX	Complete if the organization answered 'Yes' on Form 990, Pa	rt IV. lin	ne 11d.	See Form 990, Part
	(a) Description	•		,
(2)				
(3)				
(4)				
(5)				
(6)				
(7)				
(8)				
(9)				
(10)				
Total. (Colu	mn (b) must equal Form 990, Part X, col.(B) line 15.)			
Part X	Other Liabilities.			
	Complete if the organization answered 'Yes' on Form 990, Pa (a) Description of liability		ne 11e c	r 11f.See Form 9
1. (1) Federal i				
(1)				
(2)				
(3)				
(4)				
<u>(5)</u>				

(6)			
(7)			
(8)			
(9)			
Total	. (Column (b) must equal Form 990, Part X, col.(B) line 25.)		•
2. Lia	ability for uncertain tax positions. In Part XIII, provide the text of the footnote to	the organization's financia	l statem
orgai	nization's liability for uncertain tax positions under FIN 48 (ASC 740). Check here	e if the text of the footnote	has bee
			Sc
	Dog 4		
	Page 4 ——		
Sche	dule D (Form 990) 2019		
Pa	rt XI Reconciliation of Revenue per Audited Financial Stateme	-	r Retu
	Complete if the organization answered 'Yes' on Form 990, Part	t IV, line 12a.	
1	Total revenue, gains, and other support per audited financial statements		\vdash
2	Amounts included on line 1 but not on Form 990, Part VIII, line 12:	2a	
a	Net unrealized gains (losses) on investments	2b	
b	Donated services and use of facilities	2c 2c	$\overline{}$
C	Recoveries of prior year grants	2d	
d e		Zu	-
3	Add lines 2a through 2d		<u> </u>
4	Amounts included on Form 990, Part VIII, line 12, but not on line 1:		\vdash
a	Investment expenses not included on Form 990, Part VIII, line 7b.	4a	
b	Other (Describe in Part XIII.)	4b	
С	Add lines 4a and 4b		$\overline{}$
5	Total revenue. Add lines 3 and 4c . (This must equal Form 990, Part I, line 12.)		\vdash
	t XII Reconciliation of Expenses per Audited Financial Statem		per Re
	Complete if the organization answered 'Yes' on Form 990, Part	IV, line 12a.	
1	Total expenses and losses per audited financial statements		
2	Amounts included on line 1 but not on Form 990, Part IX, line 25:		
а	Donated services and use of facilities	2a	
b	Prior year adjustments	2b	
С	Other losses	2c	
d	Other (Describe in Part XIII.)	2d	
е	Add lines 2a through 2d		<u> </u>
3	Subtract line 2e from line 1		\vdash
4	Amounts included on Form 990, Part IX, line 25, but not on line 1:	1 . 1	
a	Investment expenses not included on Form 990, Part VIII, line 7b	4a	
b	Other (Describe in Part XIII.)	4b	
C	Add lines 4a and 4b		<u> </u>
5 Pai	Total expenses. Add lines 3 and 4c. (This must equal Form 990, Part I, line 18. Total expenses. Add lines 3 and 4c. (This must equal Form 990, Part I, line 18. Total expenses. Add lines 3 and 4c. (This must equal Form 990, Part I, line 18.)	
	vide the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and	1. Part IV lines 1h and 2h.	Dart V/
	s 2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to provide an		rait V, I
	A 11 165 Return Reference	Explanati	on

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Additional Data

Software ID: 19009920 **Software Version:** 2019v5.0

↑ Back to Top

Sabadula I									
Schedule L (Form 990 or 990-EZ) Complete if the organization answered "Yes" on Form 990, Part IV, line 27, 28a, 28b, or 28c, or Form 990-EZ, Part V, line 38a or 40l Attach to Form 990 or Form 990-EZ. Department of the Treasury Internal Revenue Service Go to www.irs.gov/Form990 for instructions and the latest information Warmen of the Treasury Internal Revenue Service Complete if the organization answered "Yes" on Form 990, Part IV, line 38a or 40le Attach to Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990, Part IV, line 38a or 40le Attach to Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990, Part IV, line 38a or 40le Complete if the organization answered "Yes" on Form 990 or Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990 or Form 990-EZ. Complete if the organization answered "Yes" on Form 990-EZ. Complete if the organization answered "Yes" on Form 990-EZ. Complete if the organization answered "Yes" on Form 990-EZ. Complete if the organization answered "Yes" on F						nes 2! I0b.			
Name of the organization ALLIANCE FOR RESPONSIBLE POLICY INC	n LE ATMOSPHE	RIC							nploy 2-1207
	nefit Tran	sactions (section F	501 <i>(</i> c)(3) section	501(c)(4) and	d section 501(c		
		•					25b, or Form 9		_
	of disqualif				elationship be		lified person ar		(c) De tra
Complete if reported ar	of tax, if any and/or F the organic amount or	rom Interzation answer	 above, re rested l ered "Yes Part X, li	Personal in entire in enti	ons. Form 990-EZ	rganization . Part V, line 3	8a, or Form 99	0, Pari	t IV, lii
	(a) Name of the laterested person (b) Relationship (c) Purpose of loan (d)				o or from the zation?	(e) Original principal amount	(f) Balance due	(g) defa	
			То		From			Yes	No
									\vdash

Total				\$	<u>'</u>	
Part III Grants or Assis Complete if the					ine 27.	
(a) Name of interested person (b) Relationsh interested person organization		ship between erson and the	son and the		nt of assistance (d)	
For Paperwork Reduction Act Not	ice, see the Ins	tructions for Fo		0-EZ . Ca	t. No. 500	056A Sch e
Schedule L (Form 990 or 990-E2	•					
Part IV Business Trans Complete if the					ine 28a	a. 28b. or 28c.
(a) Name of interested person		(b) Rela between i person a	(b) Relationship between interested person and the organization		(c) Amount of transaction	
(1) Alcalde & Fay		Director				Lobbying & Mgt.
Part V Supplemental						
Provide additional Return Reference	information fo	r responses to	questions on		instruct (planat	
Return Reference				E)	Сріапас	Sche
Additional Data						

Software ID: 19009920

Software Version: 2019v5.0

↑ Back to Top

efile Public Visual Render

ObjectId: 202033219349301328 - Submission: 2020-11-16

SCHEDULE O

Supplemental Information to Form 990 or 990-l

POLICY INC

Department of the Treasury

ALLIANCE FOR RESPONSIBLE CFC POLICY INC - Full Filing- Nonprofit Explorer - ProPublica

complete to provide information for responses to specific questions or Form 990 or 990-EZ or to provide any additional information. Attach to Form 990 or 990-EZ.

► Go to www.irs.gov/Form990 for the latest information.

Internal Revenue Service Name of the organization ALLIANCE FOR RESPONSIBLE ATMOSPHERIC

Empl 52-12

Return Reference	Explanation
Form 990, Part VI, Line 3: Description of Delegated Duties to Management Company	Day-to-Day Operations directed by management company.
Form 990, Part VI, Line 11b: Form 990 Review Process	No review was or will be conducted.
Form 990, Part VI, Line 19: Other Organization Documents Publicly Available	No documents available to the public.

Additional Data

Software ID: 19009920

Cat. No. 51056K

Software Version: 2019v5.0

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

IN THE UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

RMS OF GEORGIA, LLC, d/b/a CHOICE)
Refrigerants, et al.,)
Petitioners,) No. 22-1313 (consolidated with No. 22-1314)
v.) with No. 22-1314)
Environmental Protection Agency, et al.,	
Respondents.)

DECLARATION OF PETER WILLIAM

- I, Peter Williams, hereby declare and state as follows:
- 1. I am over 18 years of age, and I reside in Murrells Inlet, South Carolina.
- 2. I am the petitioner in No. 22-1314, which challenges the Environmental Protection Agency's ("EPA's") denial of my application for hydrofluorocarbon ("HFC") allocations as a new market entrant in the cap-and-trade program under the American Innovation and Manufacturing Act.
- 3. The HFC allocations at issue in this litigation are valuable because HFCs can be acquired from global producers under U.S. market prices.
- 4. If I prevail in reversing the denial of my new-entrant application, there is enough "fat" in the HFC allocations for EPA to make me whole for past allocations that EPA wrongfully withheld—such as the 2022 allocation—even if the allocation has "expired." There were enough improper allocations granted in 2022-2023 baseline that could be reallocated to me, including past or future allocations under the administrative-consequence process, without affecting the legitimate allocations

made to other entities for 2022-2023.

- 5. My connection with the refrigerant-gas industry began as a businessman running a reclamation facility, New Era Environmental, Inc., in Sterling, Virginia, circa 1993-2001. As part of that process, I became familiar with the regulatory and economic issues that affect the industry, including issues under the Montreal Protocol and its successive amendments and agreements.
- 6. Although I was no longer a direct industry participant—e.g., as a reclaimer, importer, or manufacturer—I continued to work as a consultant for various industry participants on both the business side and the regulatory side.
- 7. In 2009, I registered the domain "neweragoupinc.com" and had a logo prepared for "The New Era Group, Inc."
- 8. I meant to incorporate The New Era Group, Inc. as a consultancy, but I never did so.
- 9. I nonetheless used an email at neweragoupinc.com and the logo on letterhead, including for comments to EPA rulemakings. A true and correct copy of one of the comments I submitted to EPA is attached hereto as Exhibit 1.
- 10. EPA contacted me using my New Era Group contact information, including a letter from the then-Administrator, a true and correct copy of which is attached hereto as Exhibit 2.
 - 11. My background and involvement with the industry and with New Era

Group, Inc., of Georgia is further summarized in the affidavit submitted with the letter that attorney J. Gordon Arbuckle sent to EPA on April 20, 2022, to seek reconsideration of the denial of my application, which documents I understand are at pages 12a-16a of the addendum to my motion for summary *vacatur*.

- 12. While New Era Group, Inc. of Georgia was perhaps intended to draw on the goodwill of my ongoing work with EPA under the "New Era Group" name, the Georgia corporation was separate from the New Era Group consultancy under which I had been operating.
- 13. While I was active in New Era Group, Inc. of Georgia, it was a nonprofit representing the interests of hydrochlorofluorocarbon-22 reclaimers, importers and producers of alternative refrigerants as a trade association. Although industry members participated in New Era Group, Inc. of Georgia as members for advocacy purposes, the New Era Group, Inc. of Georgia was not itself a direct participant in the economic aspects of the industry (*e.g.*, as a reclaimer, importer, or manufacturer).
- 14. When EPA requested further documentation regarding corporate status through EPA's Andy Chang, the way that he conveyed the message in his voicemail implied that applicants needed to be incorporated, not that EPA has conflated me (with my New Era Group dba) as a corporation named New Era Group, Inc. I responded with a certification that I was applying as an individual with the

attachment "StructureMemo.pdf," which I understand is at page 1a of the addendum to my motion for summary *vacatur*.

- 15. Mr. Chang replied "10-4. Thanks." A true and correct copy of his email is attached hereto as Exhibit 3. I also uploaded the "StructureMemo.pdf" to EPA's application portal.
- 16. Until I received EPA's letter dated March 31, 2022, denying my HFC application, I was not aware that EPA staff have equated me with New Era Group, Inc. of Georgia based on a legal analysis of the factors in the new-entrant program.
- 17. On April 1, 2022, I communicated with EPA's Luke Hall-Jordan and a colleague of his about the misunderstanding of my relationship with New Era Group, Inc., of Georgia. A true and correct copy of his email is attached hereto as Exhibit 4.
- 18. In response to the email from Mr. Hall-Jordan on April 26, 2022, I believe that I called him to indicate that he could discuss the HFC issues with my counsel, J. Gordon Arbuckle, who had submitted my letter to Cynthia Newberg dated April 20, 2022, which I understand is (along with my affidavit) at pages 12a-16a of the addendum to my motion for summary *vacatur*.
- 19. Later that week, on April 29, 2022, I emailed Cindy Bolinger, who is Gordon Arbuckle's legal assistant, about the process to follow, once EPA responded to the Arbuckle letter.
 - 20. Since the email from Luke Hall-Jordan on April 26, 2022, I have not

received a response to the letter that Mr. Arbuckle sent to EPA's Cynthia Newberg.

 1 have personal knowledge of the foregoing and am competent to testify thereto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 24th day of April, 2023.

Peter Williams

EXHIBIT 1



April 22, 2014

Air and Radiation Docket and Information Center Environmental Protection Agency Mail Code: 6102T 1200 Pennsylvania Avenue NW Washington, DC 20460

Re: Docket # EPA-HQ-OAR-2013-0263

Dear Sirs:

New Era Group is submitting these comments for the proposed rule entitled Protection of Stratospheric Ozone: Adjustments to the Allowance System for Controlling HCFC Production, Import and Export, 78 Fed. Reg. 78072 (December 23, 2013) (the "Proposed Rule").

Brief History:

The Environmental Protection Agency was passed the baton to phase out Ozone Depleting Chemicals by the Clean Air Act (CAA).

The initial round of these chemicals were the chlorofluorocarbons, CFCs. EPA took a whole class of chemicals that had been the main stay of air-conditioning use for years to the grave in a record fashion.

There was a clear desire for the writers of the CFC phase out rule to establish knowledge of the market through numerous data collection reports in the 1993 rule¹.

Reaching out to industries for information on the quantities along with transparent rule making made the phase out of these chemicals take place well ahead of schedule and gave a frame work for a chemical-by-chemical phase-out worst-first-approach, for HCFCs.

New Era Group, Inc.

Climate Justice

www.neweragroupinc.com



Comments Docket # EPA-HQ-OAR-2013-0263 April 22, 2014 Page 2

Current Process:

The proposed rule was published in December 2013. Prior to this rule being released meetings were held at the Office of Management and Budget. As others, we attempted to express views, concerns, and facts during the inter-governmental review process.

We hoped that those discussions would help the proposed rule meet the Agency's mandate without doing further irreparable damage to many small businesses that are affected under this action. The debate was centered on "past performance would be the prediction of future results." We simply need to look at the disaster of the April 3, 2013 rule.

We can document more than twenty times when we brought to EPA's attention the urgency of the oversupply issue and the lack of information on the magnitude of the over-supply. Most recently, the issue of oversupply was discussed at the January 23, 2014 public hearing. Prior to that, on November 1, 2013, during a joint meeting of EPA, Office of General Counsel, and Small Business, EPA was presented with and asked about the more than 1.8 billion pounds of R-22 produced or allowed to be produced from 2003 until 2012. (Attached)

After EPA published the proposed rule, we asked for and were informed that there would be a small business roundtable held by the Office of Advocacy of the United States Small Business Administration. On January 10, 2014 the formal notification was emailed advising that this meeting would convene on January 31, 2014.

While timely for the Government, it was not in the best interest of the affected entities because the issues and facts presented in the January 23, 2014 public meeting were not made available until after the Small Business roundtable meeting. Nonetheless, there was a good turn out of small and large companies.

While EPA is not required to document the meeting, the meeting exceeded SBA's allotted time and ran more than an hour. During that meeting EPA explained how they avoided doing a national survey. EPA stated on more than one occasion that its data collection resulted in identifying 80% of the United States market. But EPA has only surveyed nine companies. Nine companies hardly represent 80% of the market. It has been repeatedly stated that the Agency completely ignores the second and third tiers of distribution. The data collection needs to be expanded to wholesale, distributors as well as service companies.

New Era Group, Inc.

Climate Justice

www.neweragroupinc.com



Comments Docket # EPA-HQ-OAR-2013-0263 April 22, 2014 Page 3

SBA seemed to feel this was an issue with merit and signaled they would help conduct a wider survey if we would assist by providing information and guidance. EPA seemed to agree. In accordance with that agreement, we provided SBA and EPA with a list of 54 companies. (See list below.) We felt that the 19 companies listed in column one would contribute significantly to our effort to uncover the stockpiled gas in the United States.

Column number two represents the major right holders that have now or can acquire HCFC-22 legally for the control periods of 2014 through 2019. While large companies control the amounts of rights in column two, the majority of this group is small companies as defined by the NAICS Codes.

Column number three represents the reclaim industries' largest contributors to the effort to contain refrigerant gas. Within the questions asked in any section 114 letters, the question of how much gas is sitting on the sidelines needs to be asked. The question of crossed gas must be considered as some companies have large amounts of gas that might not be taken into the national reporting.

What is not included in this list are the large property management companies that control apartment and commercial buildings throughout the United States. These companies also maintain a significant inventory of R-22.

Additionally, in the spirit of cooperation the Department of Defense should be able to submit the total number of pounds not committed to the ODS Reserve of the DOD. Consider that the ODS Reserve that is exempted from this discussion operates under "Memorandum of Understanding" from several agencies to store and maintains inventory of controlled substances for many United States agencies. The General Service Administration has warehouses all around the country.

Also, EPA has a program called GreenChill Partnership. This program does not attempt to identify the amount of HCFC-22 that is stockpiled in the aggregate amount for that industry. It is well within the Agency's authority to obtain the stockpiled information of that group even without a Section 114 letter.

The aggregate inventory from the nine companies that is based on the Agency's own information shows that for the period 2003 through 2011, the estimates EPA has used are wrong. Consider that in 2009 only 48.7% of the rights granted by EPA were used.

New Era Group, Inc.

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Comments Docket # EPA-HQ-OAR-2013-0263 April 22, 2014 Page 4

Yet in spite of the data that is reported no adjustment was made to eliminate what must be seen as unwanted rights.

The Agency fails to use and consider its own information and to advance a rule that considers the mandate to protect the environment.²

This proposed rule was published in the Federal Register on December 24, 2013. A public hearing was held at the behest of the all affected parties. The Docket for Public comments was closed on March 10, 2014 for the first time, and will close today for the second time yet relevant data, i.e. the allowance information is not available for public review. The National reclaim information is not available for public review.

EPA asks for comments on this proposed action when the information needed to do so is not available during the comment period.

In recent conversation with Senior Managers of SBA's Office of Advocacy, we challenged EPA's certification of the rule under the Regulatory Flexibility Act. SBA points out that EPA asserts that the proposed rule does not have an adverse affect on a significant member of small business. This statement is directed toward the section of the rule that deals with "right holders." This rule alters or changes other elements of 40 CFR Title VI, Sections 608 and 609. Therefore, the RFA and SBREFA issues have not been met.

"I. Regulated Entities

This rule will affect the following categories:"3

This reversal is absent of any public disclosure as to why.

New Era Group, Inc.

Climate Justice

www.neweragroupinc.com

² http://dataweb.usitc.gov. International Trade Commission/United States Department of Commerce. https://www.piers.com/MarketResearch

³ 66412 Federal Register/Vol. 74, No. 239/Tuesday, December 15, 2009/Rules and Regulations



Comments Docket # EPA-HQ-OAR-2013-0263 April 22, 2014 Page 5

In addition to these facts the EPA completely argues against themselves in the rule of 2009 on this very issue.

The RFA certification in this proposed rule is now more than five years old. EPA needs to simply look at the financial events of the past five years. The United States Tax Payer has been asked to extend trillions of dollars to large banks and other industries to over a recession in the United States.

We ask that EPA stop the process that has been used to create this environmental and industry wide debacle and use information and resources.

It is not too late to take corrective action for the good of the Nation.

Thank you in advance

Peter Williams

Market Research on Tariff 2903 71 0000

hipper Address	Consignee	Consignee Address	Consignee Address 2	Consignee Address 3
ANGSU 215522	ARKEMA INC.	900 FIRST AVENUE BUILDING 10	KING OF PRUSSIA	PENNSYLVANIA 19406
ANGSU, P.R.CHINA	ARKEMA INC.	900 FIRST AVENUE BUILDING 10	KING OF PRUSSIA,PA 19406-1308	CONTACT PERSON: LIND GALLOP
leasure	Measure Unit	Quantity	IMO Number	Country of Origin
1.00	CM	4,900.00	9267649	PEOPLES REP OF CHINA
0.00	CM	1,960.00	9330991	PEOPLES REP OF CHINA
0.00		4,900.00	9143568	PEOPLES REP OF CHINA
1.00	CM	4,900.00	9260419	PEOPLES REP OF CHINA
0.00		4,900.00	9356713	PEOPLES REP OF CHINA
0.00		4,900.00	9193305	PEOPLES REP OF CHINA
0.00		4,900.00	8902565	PEOPLES REP OF CHINA
0.00		3,920.00	9367205	PEOPLES REP OF CHINA

HTS - 2903710000: CHLORODIFLUOROMETHANE (HCFC-22) Customs Value by Customs Value for ALL Countries

U.S. Imports for Consumption

Annual Data

6	2012	2013	Percent Change
Country	In Actual Dollars		2012 - 2013
China	27,436,000	29,301,114	6.8%
Mexico	9,927,275	12,309,375	24.0%
Netherlands	0	2,241,631	N/A
India	306,914	371.551	21.1%
Belgium	255,499	273,757	7.1%
United Kingdom	145,170	50,550	-65.2%
Total	38,070,858	44,547,978	17.0%

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.

EXHIBIT 2

THE ADMINISTRATOR OF THE ENVIRONMENTAL PROTECTION AGENCY



WASHINGTON DE 30460

MAR 1 3 2014

Mr. Peter V. Williams New Era Group 17 Grey Moss Road Murrells Inlet, South Carolina 29576

Dear Mr. Williams:

The U.S. Environmental Protection Agency has considered the petition you submitted on June 3, 2013, asking the EPA to reconsider the April 3, 2013, final rule titled "Adjustments to the Allowance System for Controlling HCFC Production, Imports, and Exports" (78 Fed. Reg. 20004). The petition states that the "probable consequences" of the final rule are "[l]aunching an [a]dverse [e]nvironmental effect"; "[c]reating an inequitable [c]hemical [i]ndustry [m]arketplace in the U.S."; and providing a specified number of allowances to two foreign-based companies. Because the petition does not state grounds that satisfy the requirements of section 307(d)(7)(B) of the Clean Air Act, the EPA is denying the petition.

I. Background

On April 3, 2013, the EPA published a final rule allocating allowances for the production and consumption of HCFC-22, HCFC-142b and other HCFCs during the 2012, 2013 and 2014 control periods.

On June 3, 2013, you sent the EPA a petition requesting that the agency reconsider the April 3, 2013, rule pursuant to 307(d)(7)(B) of the act. The petition contains a list of nine objections to the final rule. In general, these objections appear to relate to the size of the HCFC-22 allocation and the existence of the HCFC-142b allocation. Some of the objections relate to the amount of allowances allocated to specific companies following the decision by the U.S. Court of Appeals for the District of Columbia. Circuit in Arkema v. EPA.

On February 27, 2014, your attorneys sent the EPA a letter that requested a response to the petition. This letter constitutes that response. While we take exception to some of the characterizations in the February 27, 2014, letter, we are not addressing that letter in detail here. We note, however, that the letter incorrectly asserts that during the development of the April 3, 2013, rule, the EPA possessed HCFC-22 inventory data that it "failed to provide [to] the public." The letter appears to be referring to inventory data submitted in response to requests made under section 114 of the Clean Air Act in 2013. However, the EPA did not send out the section 114 requests until August 8, 2013, well after the April 3, 2013, rule was final.

Other portions of the February 27, 2014, letter appear to relate to the December 24, 2013, notice of proposed rulemaking regarding the allocation of HCFC allowances for 2015-2019. We intend to treat

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those portions of the February 27 letter as comments on the December 24, 2013, proposed rule and will add the letter to the docket for that rulemaking.

II. Standard for Reconsideration

Section 307(d)(7)(B) of the Clean Air Act states:

Only an objection to a rule or procedure which was raised with reasonable specificity during the period for public comment (including any public hearing) may be raised during judicial review. If the person raising an objection can demonstrate to the Administrator that it was impracticable to raise such objection within such time or if the grounds for such objection arose after the period for public comment (but within the time specified for judicial review) and if such objection is of central relevance to the outcome of the rule, the Administrator shall convene a proceeding for reconsideration of the rule and provide the same procedural rights as would have been afforded had the information been available at the time the rule was proposed. If the Administrator refuses to convene such a proceeding, such person may seek review of such refusal in the United States court of appeals for the appropriate circuit. Such reconsideration shall not postpone the effectiveness of the rule. The effectiveness of the rule may be stayed pending such reconsideration, however, by the Administrator or the court for a period not to exceed three months.

Thus, for reconsideration to be mandated, a petition for reconsideration must show why the objection or claim could not have been presented during the comment period – either because it was impracticable to raise the objection during that time or because the grounds for raising the objection arose after the period for public comment but within 60 days of publication of the final action, i.e., "the time specified for judicial review." The petition must also show that the objection is of central relevance to the outcome of the rule. To be of central relevance to the outcome of a rule, an objection must provide substantial support for the argument that the promulgated regulation should be revised. See 76 Fed. Reg. 28318 (May 17, 2011) and other actions there cited.

III. Petition for Reconsideration

The petition does not explain why you could not have raised your objections to the HCFC-22 and HCFC-142b allowance allocations during the public-comment period, as section 307(d)(7)(B) requires. The EPA did not receive comments from you on the Notice of Proposed Rulemaking covering 2012-2014 HCFC allowances. The EPA took comment on a range of values for the HCFC-22 allowance allocation, including the value that was ultimately adopted in the final rule. See 77 Fed. Reg. at 242-243 and 77 Fed Reg. at 245-254. The EPA received comments on the size of the HCFC-22 allowance allocation and the effect the timing of the rule could have on the market and responded to them in the final rule. See 78 Fed. Reg. at 20008-20020 and the Response to Comments document available at www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2011-0354-0168. Similarly, the EPA took comment on the HCFC-142b allowance allocation (see 77 Fed. Reg. at 242-243 and 77 Fed. Reg. at 245-254) and received comments on both the specific amount of the allocation and the broader question of whether to allocate allowances for this chemical. See the Response to Comments document available at www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2011-0354-0168.

The petition maintains that the consequences of the final rule arose after the close of the public-comment period. The petition lists three consequences: "[l]aunching an [a]dverse [e]nvironmental effect";

"[c]reating an inequitable [c]hemical [i]ndustry [m]arketplace in the U.S."; and providing a specified number of allowances to two foreign-based companies.

The concern regarding the environmental effect of the rule appears to be related to the allowance allocation and to the effects of that allocation on the reclamation industry. As discussed, the EPA took comment on the proposed allocations of HCFC-22 and HCFC-142b allowances and issued allowances in the final rule that were within the ranges described in the proposal. Any concerns regarding the environmental effects of the proposed allocation levels could have been raised during the public-comment period. In fact, numerous entities did submit comments on the environmental ramifications of the various options proposed, including the level of allowances provided and whether the EPA should provide recoupment allowances from the annual allocation or in addition to the annual allocation. See the Response to Comments document available at www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2011-0354-0168.

In addition, the issue of how the allocation might affect the reclamation industry was clearly discussed during the rulemaking. For example, the preamble to the proposed rule stated that "a lower virgin supply will further incentivize recovery and reclamation" (77 Fed. Reg. at 247). Indeed, the EPA stated that it was proposing "to allocate fewer HCFC-22 consumption allowances than contemplated in the 2009 final Rule for 2012-2014 in order to promote recovery and reclamation and encourage transition to non-ODS alternatives." (77 Fed. Reg. at 244).

While the petition identifies effects on the marketplace as arising after the close of the public-comment period, it nonetheless describes such effects as "foreseeable" and "probable." It further states that "NEG and other members of the public could have probably predicted how the After-Effect of this Final Rule would turn the Refrigerant-gas Marketplace, upside down." In fact, the EPA received and responded to at least 40 comments addressing market impacts. One example is a comment from Heating, Air-Conditioning and Refrigeration Distributors International who stated that "there would be significant financial harm and devaluation of inventory for distributors who purchased HCFC-22 during the interim guidance period," if the EPA set the final allocation higher than at the level permitted by the non-enforcement letter. Several others commented on the effects the price and oversupply of HCFC-22 have on refrigerant sales and reclamation. See the Response to Comments document available at www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2011-0354-0168.

Additionally, the petitioner and several companies represented by the petitioner submitted comments on market effects of the August 5, 2011, HCFC allowance-allocation rule (76 Fed. Reg. 47451) ("2011 Interim Final Rule") and other past HCFC allowance-allocation rules. Comments submitted in response to the 2011 Interim Final Rule were considered and responded to in the development of the April 23, 2013, rule. See the Response to Comments document available at www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2011-0354-0168. Comments like these encouraged the EPA to reduce the overall allocation between 2012 and 2014 by almost 30 percent relative to the 2009 final rule, which was partially vacated by the U.S. Court of Appeals for the District of Columbia Circuit in Arkema v. EPA (618 F.3d 1, D.C. Cir. 2010). Thus, there has been an ongoing dialogue between stakeholders, including the petitioner, and the EPA regarding the market effects of the HCFC allowance-allocation rules. There is no reason the petitioner could not have submitted comments on such effects during the public-comment period for the April 23, 2013, rule.

The third consequence listed in the petition is that two foreign-based companies received specified numbers of production and consumption allowances as well as recoupment allowances. The EPA

proposed and took comment on both baseline and calendar-year production and consumption allowances. See 77 Fed. Reg. at 245. In addition, the EPA proposed and took comment on recoupment allowances. See 77 Fed. Reg. at 248. The baseline, calendar-year and recoupment allowances in the final rule are all within the ranges described in the proposal. 77 Fed. Reg. 237. Thus, the allowance allocation to the two foreign-based companies that appears in the final rule did not arise after the close of the public-comment period.

The EPA has determined that all of the objections or claims raised in the petition could have been presented to the EPA during the rulemaking. Most if not all of the topics addressed in the petition were in fact raised by other commenters during the public-comment period.

IV. Conclusion

Because the petition does not state grounds requiring reconsideration under section 307(d)(7)(B), the EPA is denying the petition.

We appreciate your interest in this matter.

100

EXHIBIT 3

RE: Reconsideration of Set-aside determination

Hall-Jordan, Luke <Hall-Jordan.Luke@epa.gov>

Fri 4/1/2022 5:33 PM

To: peter neweragroupinc.com <peter@neweragroupinc.com>

Hi Pete,

As we discussed today, I am not aware of any opportunities to resolve this as the set-aside allowances issued yesterday are a final agency action. However, I committed to regrouping internally to see if there are any options available, and will let you know if we identify anything.

Best, Luke

From: peter neweragroupinc.com <peter@neweragroupinc.com>

Sent: Friday, April 1, 2022 2:42 PM

To: Hall-Jordan, Luke < Hall-Jordan.Luke@epa.gov> **Subject:** Reconsideration of Set-aside determination

Luke,

Thank you and Karen for taking my call today. I look forward to resolving the issue with my application. I will be providing you with information to resolve the question of my relationship with Ken Ponder and RMS. I will send some relevant information to you next week, and look forward to your direction on how to proceed.

Pete Williams 202 528 0038

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EXHIBIT 4

RE: New Era Group: HFC Set-aside application follow-up

Chang, Wei-An (Andy) < Chang. Andy@epa.gov>

Tue 2/22/2022 2:46 PM

To: peter neweragroupinc.com <peter@neweragroupinc.com>

10-4. Thanks.

Andy Chang, M.S. (he/his/him)
U.S. EPA | Office of Atmospheric Programs
Stratospheric Protection Division | Stratospheric Program Implementation Branch 202-564-6658 (direct)

From: peter neweragroupinc.com <peter@neweragroupinc.com>

Sent: Tuesday, February 22, 2022 2:39 PM

To: Chang, Wei-An (Andy) < Chang. Andy @epa.gov>

Subject: Re: New Era Group: HFC Set-aside application follow-up

Andy,

this is what I uploaded today

Pete Williams 202 528 0038

Notice: This email, and any attachments thereto, are intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this email, you are hereby notified that any dissemination distribution or copying of this email, and any attachments thereto, is strictly prohibited. If you have received this email in error, please immediately notify me by telephone and permanently delete the original and destroy any printout thereof.

From: Chang, Wei-An (Andy) < Chang. Andy @epa.gov >

Sent: Tuesday, February 22, 2022 2:31 PM

To: peter neweragroupinc.com < <u>peter@neweragroupinc.com</u>> **Subject:** RE: New Era Group: HFC Set-aside application follow-up

Hi Pete,

Just a reminder this is due at some point today via ODSTS (other documents flow). Disregard if you've already submitted, as I can't see everything in the system.

Andy

Andy Chang, M.S. (he/his/him)
U.S. EPA | Office of Atmospheric Programs
Stratospheric Protection Division | Stratospheric Program Implementation Branch 202-564-6658 (direct)

From: Chang, Wei-An (Andy)

Sent: Friday, February 18, 2022 11:58 AM

To: peter neweragroupinc.com < peter@neweragroupinc.com > **Subject:** New Era Group: HFC Set-aside application follow-up

Dear Pete

I am writing to follow up on your set-aside application under the HFC Allowance Allocation and Trading Program Rule for calendar years 2022 and 2023. I left a voicemail for you as well on your phone number ending -0038 a few moments ago as well.

Your application was missing certain elements, and the following email was transmitted from HFCAllocation@epa.gov on February 7, 2022.

Dear Stakeholder,

You are receiving this email because you have applied as a new market entrant to the set-aside pool of allowances under EPA's HFC Phasedown Allowance Allocation and Trading Program Rule, as codified in 40 CFR 84.15(c)(2) and described here: https://www.epa.gov/climate-hfcs-reduction/hfc-allocation-rule-reporting-and-recordkeeping#set-aside.

After reviewing your application, EPA has determined that your submission is incomplete. Specifically, the application required supporting documentation for three sections: (1) official documentation verifying the corporate structure of your company; (2) confirmation from your prospective exporter that your timeline for imports is accurate and achievable; and (3) a letter from a responsible official at your company certifying certain acknowledgements, provisions, and requirements.

Your application is missing corporate structure documentation. Please consult the instructions in the set-aside application form you submitted for acceptable criteria and required elements. You have 10 calendar days from the receipt of this email to respond via the Other Documents data flow in CDX with the necessary documents.

Please contact <u>Emily.Adkins@icf.com</u> (EPA Contractor Support) if you have additional questions.

Sincerely,

Emily Golla HFC Allocation Rule Reporting Contractor Support Stratospheric Protection Division U.S. Environmental Protection Agency

The deadline to respond was February 17, 2022, and EPA does not have a record of you submitting the above-referenced materials. If these supporting documents are not provided using the instructions provided above by February 22, 2022, your application will be deemed incomplete and the Agency will deny your application for set-aside allowances. If you have additional questions, please contact Emily.Adkins@icf.com (EPA Contractor Support).

Best.

Andy

Andy Chang, M.S. (he/his/him)
U.S. EPA | Office of Atmospheric Programs
Stratospheric Protection Division | Stratospheric Program Implementation Branch 202-564-6658 (direct)

United States Court of Appeals

FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 22-1025

September Term, 2022

EPA-86FR55841

Filed On: July 7, 2023

RMS of Georgia, LLC, d/b/a Choice Refrigerants,

Petitioner

٧.

Environmental Protection Agency and Michael S. Regan, Administrator, United States Environmental Protection Agency,

Respondents

Consolidated with 23-1104

No. 22-1313

EPA-87FR19683 EPA-87FR61314

RMS of Georgia, LLC, d/b/a Choice Refrigerants,

Petitioner

٧.

Environmental Protection Agency and Michael S. Reagan, Administrator, United States Environmental Protection Agency,

Respondents

Consolidated with 22-1314

United States Court of Appeals

FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 22-1025 No. 22-1313 September Term, 2022

BEFORE: Henderson, Walker, and Garcia, Circuit Judges

ORDER

Upon consideration of the motion to dismiss No. 22-1314, the opposition thereto, and the reply; the motion for partial summary vacatur in No. 22-1314, the opposition thereto, and the reply; the motion to sever and hold No. 22-1313 in abeyance, the response in support of the motion, and the opposition to the motion; the motions for leave to intervene filed by FluoroFusion Specialty Chemicals, Inc. ("FluoroFusion") in No. 22-1025, et al., and No. 22-1313, the oppositions to those motions, and the replies; the unopposed motion for entry of a protective order in No. 22-1313, et al.; and the motions to govern future proceedings in No. 22-1025, et al., each containing a motion to consolidate with No. 22-1313, and the response to petitioner's motion, it is

ORDERED that the motion to dismiss No. 22-1314 be granted. Petitioner Peter Williams failed to petition for review of the EPA's denial of his new-market-entrant application and 2022 allocation of set-aside hydrofluorocarbon ("HFC") allowances within the requisite sixty days of respondents publishing notice of such action in the Federal Register. See 42 U.S.C. §§ 7607(b)(1), 7675(k)(1)(C); Growth Energy v. EPA, 5 F.4th 1, 12–13 (D.C. Cir. 2021) (per curiam). To the extent Williams claims that the EPA has unreasonably delayed in ruling on his reconsideration petition, jurisdiction over that claim lies in the district court. See 42 U.S.C. §§ 7604(a), 7675(k)(1)(C); Mexichem Specialty Resins, Inc. v. EPA, 787 F.3d 544, 553 n.6 (D.C. Cir. 2015). Lastly, Williams lacks standing to challenge the EPA's 2023 allocation of allowances because he has failed to demonstrate any injury "fairly traceable" to that agency action, as opposed to the EPA's earlier action finding him ineligible for allowances. Nat'l Ass'n of Home Builders v. U.S. Army Corps of Engineers, 663 F.3d 470, 474 (D.C. Cir. 2011). It is

FURTHER ORDERED that the motion for partial summary vacatur in No. 22-1314 be dismissed as moot. It is

FURTHER ORDERED that the motion to sever and hold No. 22-1313 in abeyance be dismissed as moot. The dismissal of No. 22-1314 moots the request for severance, and the Eleventh Circuit's earlier decision transferring No. 23-1104 to this court moots the request to hold No. 22-1313 in abeyance pending that decision. It is

United States Court of Appeals FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 22-1025

September Term, 2022

No. 22-1313

FURTHER ORDERED that No. 22-1025, et al., be returned to the court's active docket and that the motions to consolidate No. 22-1025, et al., with No. 22-1313 be granted. It is

FURTHER ORDERED that the motions for leave to intervene be granted. It is

FURTHER ORDERED that the motion for entry of a protective order be granted, and the protective order attached hereto be entered. It is

FURTHER ORDERED that the EPA file a certified index to the record in the now-consolidated cases within seven days of the date of this order. The Clerk is directed to enter a briefing schedule.

Pursuant to D.C. Circuit Rule 36, this disposition will not be published. The Clerk is directed to withhold issuance of the mandate in No. 22-1314 until seven days after resolution of any timely petition for rehearing or petition for rehearing en banc. <u>See</u> Fed. R. App. P. 41(b); D.C. Cir. Rule 41.

Per Curiam