

Grants to For Profit Entities

To address a wide array of media & storytelling efforts, initiatives, and organizations in Chicago, in addition to providing support for tax-exempt nonprofit organizations, the Field Foundation will accept letters of inquiry (LOIs) and, under limited circumstances, will consider grant applications from for-profit entities where the requested grant will be used exclusively for charitable or educational purposes.

The terms charitable and educational have the meanings ascribed to them in Section 501(c)(3) of the Internal Revenue Code and the Treasury Regulations thereunder.

The term charitable is used in Section 501(c)(3) in its generally accepted legal sense and includes relief of the poor and distressed or of the underprivileged; advancement of religion; advancement of education or science; erection or maintenance of public buildings, monuments, or works; lessening the burdens of government; lessening neighborhood tensions; eliminating prejudice and discrimination; defending human and civil rights secured by law; and combating community deterioration and juvenile delinquency.

Educational purposes relate to the instruction or training of the individual for the purpose of improving or developing his capabilities, or the instruction of the public on subjects useful to the individual and beneficial to the community. An activity may be educational even though it advocates a particular position or viewpoint as long as it presents a sufficiently full and fair exposition of the pertinent facts as to permit an individual or the public to form an independent opinion or conclusion. An activity is not educational, however, if its principal function is the mere presentation of unsupported opinion.

Grant requests and LOIs from Illinois for-profit organizations will be considered only where the for-profit organization demonstrates to the Foundation that the requested funding will further a charitable, educational, or other tax-exempt purpose and will <u>not</u> result in more than incidental benefit to any private persons (other than any intended charitable beneficiaries).

Generally, this will mean that the requested grant amount must not exceed the organization's cost in carrying out the charitable or educational activity and that the charitable or educational activity either will not result in any profit to the for-profit organization or its shareholders or

that any profits will be returned to the Field Foundation or otherwise dedicated exclusively for charitable or educational purposes.

In order to be considered, the Field Foundation requires the following materials be submitted in the applicant's LOI process to assist the Foundation in its analysis of the for-profit applicant—to determine whether a grant will be used exclusively for charitable, educational, or other permissible tax-exempt purposes <u>and</u> will not result in impermissible private benefit. These items include:

- Governing Documents (including all amendments), including:
 - o Articles of Incorporation and Bylaws, if a corporation
 - o Articles of Organization and Operating Agreement, if an LLC
 - Certificate of Limited Partnership/Limited Liability Partnership and Partnership
 Agreement, if a limited partnership or limited liability partnership
- Narrative statement explaining how the requested funding would further a charitable or educational purpose
- Narrative statement explaining how the for-profit organization would ensure that the requested funding would not result in an impermissible benefit to the for-profit organization or its owners

If an organization is invited to submit an application after a review of the LOI, the following additional items will be required:

- Most Recent Audit
- List of Directors and Officers
- Any policy or other document that sets forth the charitable or educational purpose of the project proposed for funding

Requests from for-profit entities are only eligible within the following two categories:

- 1. **Idea exchange, active communication and convenings:** Field will host periodic meetings with media makers, journalists, and storytellers to exchange ideas and will foster idea exchanges between philanthropy and journalists/ journalistic outlets, as well as support skill building.
- 2. Content creation: To create new compelling content aimed at narrative/culture/policy change will be eligible for grants. Please note that in funding the creation of content (not currently available via the outlet due to demonstrated lack of resource) aimed at policy change, the Foundation will avoid funding any request that constitutes lobbying activity within the meaning of the Internal Revenue Code.