

Form 1023 Checklist

(Revised October 2004)

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

Note. Retain a copy of the completed Form 1023 in your permanent records. Refer to the General Instructions regarding Public Inspection of approved applications.

Check each box to finish your application (Form 1023). Send this completed Checklist with your filled-in application. If you have not answered all the items below, your application may be returned to you as incomplete.

- Assemble the application and materials in this order:
- Form 1023 Checklist
 - Form 2848, *Power of Attorney and Declaration of Representative* (if filing)
 - Form 8821, *Tax Information Authorization* (if filing)
 - Expedite request (if requesting)
 - Application (Form 1023 and Schedules A through H, as required)
 - Articles of organization
 - Amendments to articles of organization in chronological order
 - Bylaws or other rules of operation and amendments
 - Documentation of nondiscriminatory policy for schools, as required by Schedule B
 - Form 5768, *Election/Revocation of Election by an Eligible Section 501(c)(3) Organization To Make Expenditures To Influence Legislation* (if filing)
 - All other attachments, including explanations, financial data, and printed materials or publications. Label each page with name and EIN.
- User fee payment placed in envelope on top of checklist. DO NOT STAPLE or otherwise attach your check or money order to your application. Instead, just place it in the envelope.
- Employer Identification Number (EIN)
- Completed Parts I through XI of the application, including any requested information and any required Schedules A through H.
- You must provide specific details about your past, present, and planned activities.
 - Generalizations or failure to answer questions in the Form 1023 application will prevent us from recognizing you as tax exempt.
 - Describe your purposes and proposed activities in specific easily understood terms.
 - Financial information should correspond with proposed activities.
- Schedules. Submit only those schedules that apply to you and check either "Yes" or "No" below.
- | | | | |
|------------|--|------------|--|
| Schedule A | Yes ___ No <input checked="" type="checkbox"/> | Schedule E | Yes ___ No <input checked="" type="checkbox"/> |
| Schedule B | Yes ___ No <input checked="" type="checkbox"/> | Schedule F | Yes ___ No <input checked="" type="checkbox"/> |
| Schedule C | Yes ___ No <input checked="" type="checkbox"/> | Schedule G | Yes ___ No <input checked="" type="checkbox"/> |
| Schedule D | Yes <input checked="" type="checkbox"/> No ___ | Schedule H | Yes ___ No <input checked="" type="checkbox"/> |

An exact copy of your complete articles of organization (creating document). Absence of the proper purpose and dissolution clauses is the number one reason for delays in the issuance of determination letters.

- Location of Purpose Clause from Part III, line 1 (Page, Article and Paragraph Number) _____
- Location of Dissolution Clause from Part III, line 2b or 2c (Page, Article and Paragraph Number) or by operation of state law _____

Signature of an officer, director, trustee, or other official who is authorized to sign the application.

- Signature at Part XI of Form 1023.

Your name on the application must be the same as your legal name as it appears in your articles of organization.

Send completed Form 1023, user fee payment, and all other required information, to:

Internal Revenue Service
P.O. Box 192
Covington, KY 41012-0192

If you are using express mail or a delivery service, send Form 1023, user fee payment, and attachments to:

Internal Revenue Service
201 West Rivercenter Blvd.
Attn: Extracting Stop 312
Covington, KY 41011

NARRATIVE DESCRIPTION OF ACTIVITIES

Angels Above Foundation (the "Foundation") is a memorial observatory that came about as a result of Jeremiah Michael ("Michael") Connolly, Carole Connolly and Michele Johnson wishing to build an observatory in honor of Michael and Carol's children and Michele's siblings, Thomas Connolly and Christian Connolly who died July 2, 2005 in an accident.

The reason for building an observatory is the Connollies all have a background in science, math and astrology. Specifically, Michael, a retired engineer from Lockheed Martin Corporation, spent many a night with his children viewing stars and planets. Because of this family interest and the tragic death of Thomas and Christian, the concept of a memorial observatory came into being.

The Connollies approached the Park School District about the concept of the Foundation building an observatory on the property contributed by the School District with operation of the completed observatory to be done by the Foundation and expenses associated with insurance and utilities to be paid by the School District in exchange for the Observatory being offered to School District students as an educational resource.

The School District was responsive to this concept and is in need of a location to house a telescope that the School District owns, but does not have a sufficient facility to utilize such telescope.

The School District and the Foundation entered into a letter of understanding outlining the School District's contribution of property and later contribution of utility and insurance payments as well as a telescope and the Foundation's building and maintenance of the observatory to be built for the use of students of the School District as well as the general public.

The Foundation will be used by the School District in their science curriculum and as a tool to encourage learning by students and members of the public in principles of science, math and astronomy.

Funding of the Foundation will be done by soliciting grants from large corporations interested in supporting education in science, math and/or astronomy, members of the public, individuals interested or businesses interested in remembering Thomas Connolly and/or Christian Connolly and contributions from the School District.

The Foundation is utilizing the concept of the Little Thompson Observatory ("LTO") located in Berthoud, Colorado who built an observatory on land owned by the Berthoud School District. LTO operates the facility and it is used for education of school students and for the public.

PART V
QUESTION 1(a)

CONTINUATION

<u>Name</u>	<u>Title</u>	<u>Mailing Address</u>	<u>Compensation</u>
Dr. Steve Little	Director	566 Darcy Drive Estes Park, CO 80517	0

PART V
QUESTION 2

2a. Are any of your officers, directors, or trustees related to each other through family or business relationships?

ANSWER: Yes, Jeremiah Michael Connolly and Carole Connolly are married and their daughter is Michele Johnson.

b. Do you have a business relationship with any of your officers, directors, or trustees other than through their position as an officer, director or trustee:

ANSWER: Yes, Linda Chapman is the Superintendent of Park School District R-3 and serves as Member of the Board of Directors of the Angels Above Foundation.

PART V
QUESTION 3(a)

DIRECTORS' QUALIFICATIONS

<u>Name</u>	<u>Qualifications</u>	<u>Hours Worked</u>	<u>Duties</u>
1. Jeremiah Michael Connolly	engineer, amateur astronomer		President
2. Michele Johnson	resident of Park County, Amateur astronomer, founder		Sec./Treas.
3. David Parker	attorney		Director
4. Linda Chapman	Superintendent of Park County School District R-3		Director
5. Dr. Mary Ann Varanka-Martin	science teacher, Park County School District R-3, astronomer		Director
6. Dr. Steve Little	resident of Park County, professional astronomer, teacher		Director

PART V
QUESTION 5(a)

CONFLICT OF INTEREST POLICY

The Angels Above Foundation Board of Directors unanimously adopted the model conflict of interest policy contained in Appendix A to the instructions to Form 1023, in substantially the same form and contained therein, unchanged and unamended, the “Conflict of Interest Policy.”

PART V
QUESTIONS 9(b) THRU 9(c)

b. Describe any written or oral arrangements you made or intend to make.

ANSWER: The Angels Above Foundation (the "Foundation") and Park County School District R-3 ("School District") have entered into a letter of understanding whereby the School District has agreed to lease real property owned by the School District to the Foundation for the purpose of the Foundation to construct an observatory on the property. The Letter is a non-binding statement of understanding giving the Foundation and School District sixty (60) days to enter into a lease agreement.

The basic understanding between the Foundation and the School District as outlined in the Letter is:

1. School District to lease undetermined property owned by School District to Foundation for purpose of Foundation constructing an observatory
2. Funding for cost of observatory
 - a. Land, telescope, property and liability insurance, utilities, to be paid by School District
 - b. Construction and maintenance of observatory as well as staffing to be done by Foundation
3. Observatory is to be built for educational purposes and to be made available for education of School District students and for education and benefit of general public

c. question -----

ANSWER: Have made arrangement for the above described lease, contribution of expenses and telescope with the Park County School District R-3.

d. question -----

ANSWER: The Foundation and the School District each have a governing body composed of multiple individuals, each with enough members to control the governing body exclusive of the individual who is involved with both organizations, thereby assuring fair terms

e. question -----

ANSWER: The Foundation and the School District each have a governing body composed of multiple individuals, each with enough members to control the governing body exclusive of the individual who is involved with both organizations, thereby assuring fair terms

f. question -----

ANSWER: Letter of understanding attached

PART X
QUESTION 7

UNUSUAL GRANTS

The Angels Above Foundation (the "Foundation") has evolved out of the love for science, math and astronomy held by the members of the Connolly family, to include siblings Thomas Connolly and Christian Connolly who died in an accident on July 2, 2005, individuals to whom the Foundation was established to memorialize.

Jeremiah Michael ("Michael") Connolly, the father, is an engineer who retired from Lockheed Martin Corporation. Lockheed Martin Corporation is a company interested in promoting interest in science, math and astronomy.

Thomas Connolly was employed as a systems engineer with CQG, Inc., a company involved in supplying data and market analysis for future traders. As a company involved in the mathematical and statistical analysis, they are interested in promoting science and math awareness, as well as supporting a memorial to a former employee.

Christian Connolly was employed as an electric commerce manager with Sunrise Medical. They are interested in supporting science and math, as well as supporting a memorial to a former employee.

Sunrise Medical is involved in a medical equipment manufacturing.

It is anticipated that Lockheed Martin Corporation, CQG, Inc. and Sunrise Medical Corporation will be making substantial contributions to the Foundation in memory of Thomas Connolly and Christian Connolly. It is further anticipated that other individuals who know Thomas Connolly and/or Christian Connolly and have heard about the Foundation or have come to know about the Foundation and will contribute amounts that exceed \$5,000.00 in a given year.

It is also anticipated if contributions from other sources are sufficient for building the observatory, Jeremiah Michael Connolly will make contributions for construction of the observatory.

PART VIII
QUESTION 4(a)

Fundraising – Specific Activities

The Foundation has adopted no specific fundraising mechanism. The Foundation has had individuals and businesses contact the Foundation with interest in supporting the Foundation as a result of media coverage in the Estes Park, Colorado newspaper and through word of mouth and association.

The Foundation has many individuals who are aware of the deaths of Thomas Connolly and Christian Connolly and have worked to support the Foundation.

As of this date, no money has been received, but a list of interested individuals has been maintained for future contact seeking financial contributions.

The Foundation is primarily interested in cash donations or donations of supplies or materials to be utilized by the Foundation for building and maintaining the observatory. The Foundation is not interested in actively seeking depreciable property not related to the Foundation's activities, or intellectual property rights, but if such item has significant real value and can be sold by the Foundation, the Foundation will seek sale of such item and report such sale to the Donor.

The Foundation will not hire or pay any entity or organization to seek funds for them.

All boxes were checked as the Foundation desires to have all reasonable fundraising options open and the possibility of reasonable fundraising opportunities in the future.

PART VIII
QUESTION 5

4. Are you affiliated with a governmental unit?

ANSWER: Yes, the Foundation is affiliated with the Park County School District R-3 in regards to building and operation of the observatory to be constructed on land owned by the School District and to be utilized in teaching students of the School District.

The current understanding between the Foundation and the School District, as outlined in the letter of understanding, is the School District will provide property for the Foundation to build an observatory. The land will be owned by the School District and leased to the Foundation. The Foundation will be responsible for all costs associated with building the observatory. Once the observatory is completed, the Foundation will be responsible for operation of the observatory and the School District will provide telescope, insurance and payment of utilities. The observatory will be available to the School District for use in the educational process by School District students and will be available to the public for educational purposes.

PART VIII
QUESTION 15

15. Do you have a close connection with any organizations?

ANSWER: Yes, see response to Part VIII, Question 5.

SCHEDULE D
SECTION 11
QUESTION 4

b. Do one or more members of the governing body of the supported organization also serve as your officers, directors, trustees, or hold other important offices with respect to you?

ANSWER: Yes, Linda Chapman, Superintendent of Park County School District R-3, the supported organization also serves as a member of the Board of Directors of the Foundation.

d. Do the supported organization(s) have a significant voice in your investment policies, in the making and timing of grants, and in otherwise directing the use of your income or assets?

ANSWER: Yes, the Park County School District R-3 is providing land for the building of an observatory to be run by the Foundation with costs associated with utilities and insurance to be paid by the School District.

e. Describe and provide copies of written communications documenting how you made the supported organization aware of your supporting activities.

The Park County School District R-3 was approached and a power point presentation was given explaining the relationship and what the Foundation will contribute and what the School District will contribute.

ATTACHMENT TO
IRS FORM 1023
PART IV - NARRATIVE DESCRIPTION OF YOUR ACTIVITIES

The Angels Above Foundation was a concept that had been discussed over several years by Jeremiah Michael Connolly (hereinafter "Michael") and his children, Thomas, Christian and Michelle.

Michael, an engineer, has always had a fascination with astronomy and imparted his knowledge and desire for astronomy to his children on many a night searching the sky and looking at whatever they could see with their eyes and the aid of a telescope.

Thomas, also an engineer, was fascinated with astronomy and talked with his father about building an observatory. The observatory would be a mechanism to do what they loved, to educate those interested in astronomy and to promote the interest of science to children with a hope that they will embrace further scientific education and potentially a career in a science-related field.

The dream of a father and son establishing an observatory together was abruptly shattered on July 1, 2005 when Thomas and Christian died in a motor vehicle accident.

Michael, along with his wife Carole, and their surviving daughter Michele wanted to continue the dream of Thomas and Christian and started actively pursuing the building of an observatory in their memory and decided to form the Angels Above Foundation.

Contact was made with the Estes Park School Board regarding the idea of locating an observatory in Estes Park, Colorado that could be utilized by the school in the educational process and for extracurricular activities and community events.

The concept was for the School Board to donate land and the Angels Above Foundation would build an observatory. The observatory facility would be on land owned by the School District and would be staffed by community volunteers.

The Angels Above Foundation would build the building, outfit the interior and staff the building utilizing volunteers and contributions from individuals and businesses interested in promoting scientific education in memory of two wonderful people that loved astronomy.

ATTACHMENT TO
IRS FORM 1023
PART VIII – 4a and 11 - Fundraising

The Angels Above Foundation intends to seek funds from any qualified donor by disseminating information to community, individuals and businesses by mail, email, internet, telephone and in person, explaining the purpose and educational benefits of the Estate Park Memorial Observatory and seeking contributions from those individuals desiring to support such an endeavor.

The Angels Above Foundation intends to seek funds from grants from foundations and government grants that are available for which the Angels Above Foundation qualifies.

The Angels Above Foundation will seek donations of cash, materials and supplies for the building of the Estes Park Memorial Observatory and gifts that have a monetary value that will be utilized by the Angels Above Foundation for carrying out its objection, that can be liquidated to provide operating funds, or that will produce income for the Angels Above Foundation.

All fundraising efforts will be based out of Colorado and will seek support from individuals and businesses primarily located in Colorado and all businesses and individuals will have a connection to Colorado through various ties.

The Angels Above Foundation is primarily seeking cash, construction materials and supplies to be utilized in building the observatory, equipment and supplies to outfit the observatory, but does not want to preclude other means of gifts that will support the Foundation's efforts and any donations of any type that will not be utilized by the Foundation in carrying out its purpose (airplanes, cars, etc.) will not be encouraged, but if received, will be sold for cash, and such amount received will be documented and reported as required.