

EXHIBIT 3
Inurement and Excess-Benefit Transactions

- Is there any private inurement within the organization?
- Are there any excess-benefit transactions?
- Is compensation reasonable, and so documented?
- Are there any transactions with insiders?
- Are there any non–arm’s-length transactions with insiders, including directors, officers, managers, or contributors?
- Are joint ventures in the best interests of the organization?
- Are travel, meals, and entertainment expenses reasonable?
- Do family members of officers or directors receive any compensation (cash or noncash)? Is this compensation reasonable?
- Has the organization made any loans to officers or directors? If yes, is the interest rate on these loans comparable to the market rate?