



**The Thomas C. and Sandra S. Sullivan Foundation**

**SECTION ONE**

Date of Application	June 8, 2022
<b>ORGANIZATION INFORMATION</b>	
Applicant Organization (Full Legal Name)	Malachi House, Inc.
Doing Business As	Malachi House
Previous Name, if changed	N/A
IRS letter date	November 17, 1988
Tax Exempt ID # (EIN)	34-1598707
Name of Executive Director	Judy Ghazoul Hilow
Name of Fiscal Sponsor (if applicable)	N/A
<b>CONTACT INFORMATION</b>	
Proposal Contact Name	Judy Ghazoul Hilow
Title	Executive Director
Phone	216.621.8831
Fax	216.621.8841
E-mail	jhilow@malachihouse.org
Street Address	2810 Clinton Avenue
City	Cleveland
State	Ohio
Zip Code	44113
Organization Website	www.malachihouse.org
Mailing Address (if different than street address)	N/A
City	N/A
State	N/A
Zip Code	N/A



ORGANIZATION FINANCIAL INFORMATION	
Organization's Budgeted Expenses for Current Year <i>(give fiscal year end mm/dd/yy)</i>	\$1,625,596.66 - fiscal year end 6/30/23
Endowment Size <i>(market value as of fiscal year mm/dd/yy)</i>	\$17,164,073.64
Organization's Major Funding Sources by percentage (e.g., United Way, local community foundation, county board of health, etc.)	Individual 23%; Foundation/Grants 60%; Corporate 5%; Fundraisers 1%; Endowment 11%
ORGANIZATION'S AFFILIATION	
<input type="checkbox"/> United Way <input type="checkbox"/> Other specify: <input type="checkbox"/> Chapter of national or regional organization specify:	

REQUEST DATA	
Program/Project Title	Medically Supportive Residential House for Cleveland's Dying Poor
Total Budget for this Program/Project	\$1,625,596.66
Amount of this request	\$25,000.00
Grant Duration (e.g., one-year, two-year, etc.)	one year
Anticipated Project Start Date	July 1, 2022
Community/Counties served by this Program/Project	City of Cleveland/Cuyahoga County
Total Number of people to be served during grant period	50 to 75
Brief demographic description of population served by this Program/Project	Terminally ill individuals who lack financial and supportive resources
TYPE OF REQUEST (check all that apply)	
<input type="checkbox"/> Capital <input type="checkbox"/> Technical assistance <input checked="" type="checkbox"/> Operating <input type="checkbox"/> Endowment <input type="checkbox"/> Program/Project Start-up <input type="checkbox"/> Other – specify:	
SIGNATURES (both are required unless otherwise specified by funder)	
Signature of Executive Director	
Signature of Board President	



In general, the following narratives, which include Sections Two through Six, should not exceed five pages in total (*please confirm any page limits with each foundation to which you are submitting the application*). Responses should be typed, single-spaced, single-sided and use a 12-point type.

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## SECTION TWO – ORGANIZATIONAL BACKGROUND

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1) Brief summary of organization's history and statement of organization's mission

Malachi House was established in 1987 thanks to the pioneering vision of Fr. Hritz of St. Malachi Church and parishioner Catherine "Kaki" O'Neill. As a faith leader in Cleveland's impoverished Ohio City neighborhood, Fr. Hritz often witnessed ill homeless persons dying with no place to go or person to care for them. Believing no person should die this way, our founders set out to provide a place where those who are poor and dying could call home until death. Since opening our doors more than 3 decades ago, we have cared for more than 2,600 poor and dying residents. Our Mission: Malachi House, created out of a Christian sense of ministry, serves persons who are terminally ill, at no cost or regard to gender, race, religion, or national origin. Our home ministers to individuals who need an available caregiver, who have limited or no financial resources and who are in need of special home care in the final stages of life. A trained staff and volunteers provide spiritual, emotional, and physical support with the assistance of a hospice team.

2) Brief description of current programs/projects and activities

Malachi House has one enduring and unduplicated service. To provide the dying poor with medically supportive housing and access to medical care. The UN's International Bill of Rights states housing and health are human rights that all UN member nation's citizens are entitled. Unfortunately, in the U.S., our housing and health insurance systems do not support these rights. Particularly for poor and homeless populations, housing and healthcare are unaffordable and unattainable. Terminally ill people who lack resources to afford safe shelter or a doctor's care are often forced to die on the streets, in crowded emergency rooms, or in unstable living arrangements, lacking the healthcare, peace and dignity every person deserves.

At Malachi House, the dying poor are assured access to care. With 15 private, medically equipped bedrooms, we offer residents 24-hour care with the support of hospice partners. Our services fulfill a vital need within the healthcare and social service communities.

3) Evidence of organization's overall effectiveness based on achievement of specific organizational of program goals

Malachi House is the only organization in the region providing medically equipped and supportive housing for those who are terminally ill, poor, and housing instable. Over the last 35 years the agency has served nearly 2,600 individuals, ensuring they received the housing and care they deserve. Serving as a testament to the need and quality of our support, the agency has 10 local hospice partners that refer residents to our facility and also provide care to those who live here.

4) Description of population and geographic region (community/county) served by this organization

Malachi House's population is the dying poor. Residents have a terminal illness with less than 6 months to live, are in the care of a hospice physician, have no willing/available caregiver, limited financial means, and must have a do not resuscitate order. Further, many of our residents deal with diagnosed or undiagnosed mental health disorders, drug and alcohol dependency, and/or criminal and incarceration histories. Due to the unique nature of our work, residents come from all over Northeast Ohio to receive care. However, a majority are from Cuyahoga County and 60% from the City of Cleveland.



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**SECTION THREE – STATEMENT OF NEED**

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- 1) What is the problem, challenge or need that is unaddressed or unmet? Or what is the community benefit that this program or project will impart?

Terminally ill individuals who lack resources to afford safe shelter or medical care are often forced to die on the streets, in emergency rooms, or in unstable or inappropriate living arrangements, lacking the peace and dignity every human deserves. Malachi House helps change this outcome. By removing barriers to medical care through the provision of supportive residential housing, we eliminate healthcare disparities this medically fragile population experiences. Our housing model is one of a kind in Ohio, and in fact, is unique throughout the entire country.

- 2) What is the research, statistic(s) or evidence that shows this need or benefit exists?

According to Health Care for the Homeless Clinicians Network, standard clinical guidelines do not consider the unique challenges presented by homelessness that may limit access to needed services or the ability to adhere to a plan of care. The environment that most homeless (or near homeless) people live, is not conducive to terminal care, and many palliative/hospice facilities or hospital units are often reluctant to accept such patients due to their often-complicated issues - many of those in these situations experience mental health and/or substance abuse problems.

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**SECTION FOUR – PROGRAM/PROJECT DESCRIPTION & METHODOLOGY**

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**IMPORTANT:** *Review the funder’s program guidelines and restrictions before responding to this section.*

1) Description of program/project, including:

a) Summary description of overall program/project to be funded under this grant

Malachi House is a home that implements an innovative residential housing model, providing the dying poor a secure and supportive living environment that guarantees access to hospice and medical care at the end of life. The hospice care offered at Malachi House is provided and overseen by 10 local hospice partners who work cohesively with Malachi House staff to ensure those who live here receive needed care and support in their final days 24-hours a day, 365 days a year. Currently, the agency serves between 50 and 75 individuals yearly, down from pre-COVID service numbers due to the need to reduce bed count to ensure health safety. We hope to slowly increase our bed count as it becomes safe to do so for our medically vulnerable population.

Because Malachi House is a residential home and not a hospice facility, our services are considered charity care and we are unable to bill CMS or private insurance for the services we provide. And because our services would be cost prohibitive for those we serve if we were to charge a fee, Malachi House provides our housing and support free of charge. Therefore, we rely heavily on the philanthropic community to help support those we serve.

b) Brief description of goals and objectives for program/project

Malachi House’s ultimate goal is to help eliminate health disparities for the dying poor by ensuring they have the stable housing necessary to facilitate access to needed medical care and appropriate support at the end of life with an emphasis on hospice care.

Working hand-in-hand with hospice partners who currently include Hospice of Cleveland Clinic, VNA of Ohio, Hospice of the Western Reserve, Seasons of Life Hospice, Crossroads, All Caring Hospice, Great Lakes Caring, Heartland Hospice, and Tridia Hospice, Malachi House has created a pipeline to support that allows hospice partners to refer qualifying patients to our residential home, which then offers stable housing and 24-hour medical support until death.

c) Timetable for implementation and duration of program/project

Malachi House supports the dying poor 24-hours day, 7 days a week, 365 days a year. The support we are requesting from The Thomas C. and Sandra S. Sullivan Foundation would support this work for our FY23 fiscal year, July 1, 2022 to June 30, 2023.

d) Evidence of use of best practices (For example, is this program/project based on a program that has been shown to be effective in other settings? Is it based on national standards?). If the initiative is a pilot project and has not been done before, please list assumptions on why new approach will succeed.

Though not a hospice facility, Malachi House follows all best practices and regulatory requirements outlined by Medicare for hospice facilities to ensure we are providing the best care for residents. This includes PPE utilization and cleaning protocols. Our Clinical Director, who is a seasoned hospice nurse, oversees all caregiving staff and works cohesively with



hospice partner staff to ensure optimal care and support for our residents. Malachi House's clinical team subjectively evaluates each resident for optimal symptom management of pain, respiratory distress, anxiety, and other symptoms of the terminal disease state. Our observations are documented and reported to the attending hospice team for interventions when needed. Our outcomes are regularly shared with our internal Quality, Safety, and Performance Improvement Committee

2) Brief description of how grant funds will be used?

Malachi House's annual direct care costs amount to \$1,147,126.04 – 70% of our annual \$1.6 operating budget. With this in mind, a gift from the Foundation in the amount of \$5,000 would help Malachi House underwrite the 24-hour care of the residents we serve and help reduce the medical access disparities they too often experience.

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**SECTION FIVE – EVALUATION AND RESULTS**

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- 1) Complete the Program/Project Evaluation Chart at the end of this document.

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**SECTION SIX – PROGRAM/PROJECT FUNDING PLANS**

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- 1) List of other funders to whom this **current proposal** has been and will be submitted. For each funder, indicate amount requested and status of request (e.g. “to be submitted,” “pending,” “funded,” or “declined”). If funded, specify amount of grant and date received. The following are recent funders of Malachi House and our mission. Lozick Family Foundation – \$100,000.00; Community West Foundation – \$54,400.00; Reinberger Foundation – \$25,000.00; Andrews Foundation – \$25,000.00; Higley Fund – \$25,000.00; Thatcher Family Fund – \$25,000.00; Murphy Family Foundation – \$15,000.00; Callahan Foundation – \$12,500.00; O’Neill Brothers Foundation – \$10,000.00; Reuter Foundation – \$10,000.00; Michael and Helen Talty Charitable Trust – \$9,500.00; Huron Foundation – \$5,000.00; Cleveland Clinic Foundation – \$5,000.00; Sisters of Charity Good Samaritan Grant – \$5,000.00; Big Lots Foundation – \$4,000.00 ; S.K. Wellman Foundation – \$4,000.00; Harry & Emma R. Fox Charitable Fund – \$3,000.00; Giant Eagle Foundation – \$3,000.00; Dominion Foundation – \$2,500.00; Stolier Family Foundation – \$2,000.00
- 2) Other anticipated funding for this current proposal including:
- a) Earned revenue  
\$0.00
  - b) In-kind support  
\$0.00
  - c) Special events  
\$51,000.00
  - d) Fundraisers, etc.  
\$0.00
- 3) If this will be an ongoing program/project, describe plans and specific sources for future/long-term funding.

Malachi House prides itself in staying fiscally responsible. Our Executive Director has a background in accountancy, and we have multiple individuals on our Board who work in the financial sector. These individuals also serve on our Board Finance Committee. With the oversight of these high-level professionals, Malachi House has been able to grow our endowment. To \$19 million. This endowment is vital to our long-term operation as the agency does not qualify for reimbursement through Medicare, Medicaid, or private insurance benefits of any kind, as mentioned above. It is Board policy to allocate between 2-5% of the 3-year rolling average of endowment assets for agency operation annually. This endowment coupled with a robust fundraising plan ensures Malachi House can sustain long-term operation and remain financially solvent.

The agency has a strong base of financial supporters and donors that help support our operation and we work to ensure that these donors see the value in the support they provide. With a strong fundraising team, the agency is always increasing fundraising opportunities to help support operation above and beyond what our endowment provides.



**PROGRAM/PROJECT EVALUATION CHART**

<p><b><u>Program/Project Outcome(s)</u></b> The ultimate result of a program/ project</p>	<p><b><u>Program/Project Measures</u></b> <i>Measurable</i> results of a program/ project</p>	<p><b><u>Benchmark (\$, #, %, yes/no)</u></b> *Note: NO TEXT other than yes/no should be included in this field</p>
<p><b>Example 1:</b> To help children read better.</p>	<p>Children will improve their reading scores by one grade level.</p>	<p>50</p>
<p><b>Example 2:</b> Diversify the agency’s revenue sources and increase its financial stability</p>	<p>Hire a part-time development director. Increase private donations during 2006. Increase earned revenue during 2006.</p>	<p>Yes 30% 25%</p>
<p>Provide appropriate housing and access to compassionate hospice and end-of-life care to terminally ill patients without means.</p> <p>Ensure residents receive appropriate nutrition through regular meals.</p> <p>Maintain a high daily average resident census by quickly cleaning and preparing unoccupied rooms so they may be turned over to a new resident within 24 hours of becoming available.</p>	<p>Provide housing and support to between 50 and 75 qualifying residents annually based on space limitations and the ability of our home to safely support and house residents in the current pandemic environment.</p> <p>Ensures residents receive 3 meals day throughout their stay. This number reflects our current operation, which needed to be adjusted to ensure safety during COVID-19.</p> <p>Maintain an average daily resident census of 9. Typically Malachi House operates on a census of 12.5, which is considered full occupancy based on hospital standards (85% occupancy). However, this has been changed to reflect new COVID-19 policies. We hope to revert back when when it becomes safe to do so.</p>	<p>House at least 50 residents during the FY23/23 operating year (July 1, 2022 to June 30, 2023)</p> <p>Provide at least 6,552 meals by the end of FY22/23, June 30, 2023)</p> <p>Ensure our occupancy is maintained at 40% at all times.</p>

**The Thomas C. and Sandra S. Sullivan Foundation**



Ohio Common Grant Form  
 TOTAL ORGANIZATIONAL BUDGET FOR CURRENT FISCAL YEAR

**Name of Organization:**

Malachi House, Inc.

**Time Period (mm/dd/yy to mm/dd/yy):**

July 1, 2021 to June 30, 2022

<b>REVENUE/SUPPORT</b>	<b>Budget for Year</b>	<b>Year-to-Date (specify date - 05/31/22 )</b>
Corporate grants		
Foundation grants	\$359,004	\$642,344
Govt. grants/contracts/per diem (describe in narrative)		
Contributions	\$249,000	\$687,776
Affiliate orgs./non-govt. contracts (describe in narrative)		
Federated campaigns (describe in narrative)		
Membership dues		
Special events, fundraisers	\$88,952	\$16,486
Sponsorships		
Admissions		
Sales, rent		
Revenue, tuition		
Endowment funds	\$1,012,774	\$200,000
Interest, dividends, non-endowments investments		
Other (if more than 20% of total revenues, describe in narrative)		
<b>Total Revenue/Support</b>	<b>\$1,709,730</b>	<b>\$1,546,606</b>

**The Thomas C. and Sandra S. Sullivan Foundation**



Ohio Common Grant Form

TOTAL ORGANIZATIONAL BUDGET FOR CURRENT FISCAL YEAR

**Name of Organization:**

Malachi House, Inc.

**Time Period (mm/dd/yy to mm/dd/yy):**

July 1, 2021 to June 30, 2022

<b>EXPENSES</b>	<b>Budget for Year</b>	<b>Year-to-Date (specify date - mm/dd/yy )</b>
Salaries	\$1,023,004	\$757,957
Employee benefits, taxes	\$290,375	\$214,127
Affiliate orgs. or contracts (describe in narrative)		
Professional fees	\$25,717	\$19,493
Equipment, supplies, materials	\$28,287	\$22,410
Telephone, utilities	\$39,996	\$26,833
Postage, mailing		
Occupancy	\$167,695	\$123,850
Insurance	\$5,651	\$8,987
Training, staff development	\$28,135	\$26,214
Travel		
Conferences		
Evaluations		
Other (if more than 20% of total expenses, describe in narrative)	\$100,870	\$94,919
<b>TOTAL EXPENSES</b>	<b>\$1,709,730</b>	<b>\$1,294,789</b>
<b>Revenue less Expenses</b>	<b>\$0</b>	<b>\$251,817</b>

Please attach written narrative, or include below, for any items above requiring additional explanation. Also explain how difference will be offset if total expenses exceed total revenues/support by 10% or more.

The difference between Total Expenses and Total Income is bridged through endowment funds when needed.

Our Board-approved policy caps the amount permitted to be used at 5 percent of the three-year rolling average endowment balance.



Thomas C. and Sandra S. Sullivan Foundation  
PROGRAM REQUEST BUDGET

Name of Organization:

Malachi House, Inc

Time Period (mm/dd/yy to mm/dd/yy):

July 1, 2022 to June 30, 2023

*(items typical for running a program)*

<b>REVENUE/SUPPORT</b>	<b>Budget</b>
Corporate grants	
Foundation grants	\$429,000
Govt. grants/contracts/per diem (describe in narrative)	
Contributions	\$349,000
Affiliate orgs./non-govt. contracts (describe in narrative)	
Federated campaigns (describe in narrative)	
Membership dues	
Special events, fundraisers	\$51,000
Sponsorships	
Admissions	
Sales, rent	
Revenue, tuition	
Endowment funds	\$796,597
Interest, dividends, non-endowments investments	
Other (describe in narrative if more than 20% of total revenues)	
<b>Total Revenue/Support</b>	<b>\$1,625,597</b>



Ohio Common Grant Form  
PROGRAM REQUEST BUDGET

Name of Organization:

Malachi House, Inc.

Time Period (mm/dd/yy to mm/dd/yy):

July 1, 2022 to June 30, 2023

<b>EXPENSES</b>	<b>Budget</b>
Salaries	\$983,969
Employee benefits, taxes	\$262,026
Affiliate orgs. or contracts (describe in narrative)	
Professional fees	\$25,717
Equipment, supplies, materials	\$28,287
Telephone, utilities	\$39,996
Postage, mailing	
Occupancy	\$142,354
Insurance	\$9,000
Training, staff development	\$28,135
Travel	
Conferences	
Evaluations	
Other (describe in narrative if more than 20% of total expenses)	\$106,113
<b>TOTAL EXPENSES</b>	<b>\$1,625,597</b>
<b>Revenue less Expenses</b>	<b>\$0</b>

If expenses exceed revenues/support by more than 10%, please explain how difference will be offset. Please attach narrative if you have expenses, revenues or a deficit that require more information or if you believe additional explanation is warranted for any item.

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**The Thomas C. and Sandra S. Sullivan Foundation**

STATEMENT OF REVENUE/SUPPORT & EXPENSE (for most recently completed fiscal year)

Name of Organization:

Malachi House Inc.

Fiscal Year (mm/dd/yy to mm/dd/yy):

7/1/2020 - 6/30/2021

<b>REVENUE/SUPPORT</b>	
Corporate grants	
Foundation grants	\$407,941
Govt. grants/contracts/per diem (describe in narrative)	
Contributions	\$540,520
Affiliate orgs./non-govt. contracts (describe in narrative)	
Federated campaigns (describe in narrative)	
Membership dues	
Special events, fundraisers	\$99,396
Sponsorships	
Admissions	
Sales, rent	
Revenue, tuition	
Endowment funds	\$0
Interest, dividends, non-endowments investments	
Other (describe in narrative if more than 20% of total revenues)	
<b>Total Revenue/Support</b>	<b>\$1,047,858</b>



**The Thomas C. and Sandra S. Sullivan Foundation**

STATEMENT OF REVENUE/SUPPORT & EXPENSE (for most recently completed fiscal year)

Name of Organization:

Malachi House Inc.

Fiscal Year (mm/dd/yy to mm/dd/yy):

7/1/2020 - 6/30/2021

<b>EXPENSES</b>	
Salaries	\$750,667
Employee benefits, taxes	\$200,140
Affiliate orgs. or contracts (describe in narrative)	
Professional fees	\$22,270
Equipment, supplies, materials	\$23,719
Telephone, utilities	\$21,587
Postage, mailing	
Occupancy	\$163,224
Insurance	\$7,747
Training, staff development	\$31,660
Travel	
Conferences	
Evaluations	
Other (describe in narrative if more than 20% of total expenses)	\$88,212
<b>TOTAL EXPENSES</b>	<b>\$1,309,226</b>
<b>REVENUE LESS EXPENSES</b>	<b>-\$261,368</b>

If expenses exceed revenues/support by more than 10%, please explain how difference will be offset.

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The difference between Total Expenses and Total Income is bridged through endowment funds when needed.

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Our Board-approved policy caps the amount permitted to be used at 5 percent of the three-year rolling average endowment balance.

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# Board List and Professional Affiliations

## Executive Committee

### CHAIRPERSON

**John J. Schriener, Esq.**

Attorney  
New York Community Bancorp, Inc.  
Jschriner19@gmail.com

### VICE- CHAIRPERSON

**Matthew A. Becker**

Change Management Leader Westfield Insurance  
matthewbecker39@gmail.com

### MEDICAL DIRECTOR

**J. Brandon Walters, MD, FAAHPM**

Medical Director for Cleveland Clinic Hospice  
Walterj3@ccf.org

### TREASURER

**Jeffrey D. Neuman, CPA.**

President  
Barnes and Wendling CPAs Inc.  
jdn@barneswendling.com

### SECRETARY

**Donna M. Skurzak**

Director, Diversity and Inclusion, Regional Hospitals, Cleveland Clinic Health Systems  
skurzad@ccf.org

**Joseph C. Granzier** Financial Advisor Rehmann Financial  
Joe.granzier1@gmail.com

**Fr. Michael Gurnick**

Parish Administrator  
St. Malachi Parish  
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**Kevin M. Kelly**

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A member of the Cushman & Wakefield  
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**Diane C. Kennedy**

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**Patricia F. Krewson**

Little Mendelson Shareholder  
tkrewson@shinc.org

**L. Joseph Lee**

Partner  
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**Ann C. Lutz**  
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**Shareefah T. Sabur**  
Executive Director, Gestalt Institute of Cleveland  
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**John J. Sullivan**  
Retired- Interfibe, LLC  
jsullivan@jsullivan-sales.com

**Terrence V. Upchurch II**  
House District 10  
terrenceupchurch216@gmail.com



## **2020/21 Annual Report**

Below is the link to Malachi House's most recent Annual Report for your review.

[https://issuu.com/lpcpub/docs/annual\\_report\\_2020-2021?fr=sYmNjZjQ0OTM3MDI](https://issuu.com/lpcpub/docs/annual_report_2020-2021?fr=sYmNjZjQ0OTM3MDI)



OFFICE OF THE CHANCELLOR

THE CHANCERY  
DIOCESE OF CLEVELAND  
1027 SUPERIOR AVENUE  
CLEVELAND, OHIO 44114  
(216) 696-6525

C-594/1988

November 17, 1988

Mr. Harry N. Babcock  
Attorney at Law  
20525 Detroit Road  
Rocky River, Ohio 44116

Dear Mr. Babcock,

We have reviewed the application of Malachi House, Inc. for inclusion in the USCC Group Ruling ("Group Ruling") and listing in the Official Catholic Directory ("OCD") in the section concerning the Diocese of Cleveland. Based upon your application, supporting documentation and a review by the Diocesan Legal Office, we have approved its inclusion in the Group Ruling and its listing in the next edition of the OCD. Please inform this office of any changes in the organizational name, address, or corporate structure.

This letter establishes the exemption from federal income tax under Section 501(c)(3) of the Internal Revenue Code ("Code") for Malachi House, Inc. in the Diocese of Cleveland in the interim until the next publication of the OCD. Please retain it in your records.

Sincerely,

*Ralph E Wiatrowski /HJ*  
The Reverend Ralph E. Wiatrowski, J.C.D., S.T.L.  
Chancellor

REW/cb

cc: Father Paul Hritz

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Department of the Treasury  
Internal Revenue Service  
CINCINNATI, OH 45999

DATE OF THIS NOTICE: 11-25-88  
EMPLOYER IDENTIFICATION NUMBER: 34-1598707

17084086

B W

For assistance you may  
call us at:

522-3000 LOCAL CLEVELAND  
1-800-424-1040 OTHER OH

MALACHI HOUSE INC  
2810 CLINTON AVE  
CLEVELAND OH 44113

or you may write to us at the  
address shown to the left. If you  
write, be sure to attach the bottom  
part of this notice.

## Notice of New Employer Identification Number Assigned

Thank you for your Form SS-4, Application for Employer Identification Number (EIN). The number assigned to you is shown above. This number will be used to identify your business account and related tax returns and documents, even if you do not have employees.

Please keep a copy of this number in your permanent records. Use this number and your name, exactly as shown above, on all Federal tax forms that require this information, and refer to the number on all tax payments and tax-related correspondence or documents. Incomplete information or any variation used when filing tax returns, making FTD payments or subsequent payments may result in improper or delayed posting of payments to your account and/or the assignment of more than one EIN.

If your business is a partnership which must obtain prior approval for its tax year, the tax year you entered in Block 3 of your Form SS-4 does not establish a tax year. For guidance in determining if you must request prior approval and the method of doing so, see IRS Publication 538, Accounting Periods and Methods, available at most IRS offices.

Please note that the assignment of this number does not grant tax-exempt status to nonprofit organizations. Any organization (other than a private foundation) having annual gross receipts normally of not more than \$5,000 is exempt by statute if it meets the requirements of section 501(c)(3) of the Internal Revenue Code. These organizations are not required to file Form 1023 (Application for Recognition of Exemption) or file Form 990 (Return of Organization Exempt from Income Tax). However, if the organization wants to establish its exemption with the Internal Revenue Service and receive a ruling or determination letter recognizing its exempt status, it should file Form 1023 with the Key District Director. For details on how to apply for this exemption, see IRS Publication 557, Tax-Exempt Status for Your Organization, available at most IRS offices.

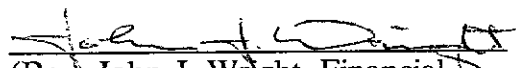
Thank you for your cooperation.

# AFFIDAVIT

STATE OF OHIO - CUYAHOGA COUNTY:

The undersigned being duly sworn, states that **Malachi House** is an organization of the Catholic Diocese of Cleveland, and as such is a tax-exempt organization under Section 501 (c)(3) of the 1954 Internal Revenue Code covered by a blanket ruling issued by the Internal Revenue Service. Said ruling is made annually, the latest bearing date August 9, 1991. Said ruling applies to all agencies, organizations, education, charitable and religious institutions operated, supervised or controlled by or in connection with the Roman Catholic Church in the United States which are listed in the **Official Catholic Directory** for 1991. **Malachi House** was granted its tax exempt status in a letter dated November 17, 1988, by the Chancellor of the Diocese of Cleveland, Rev. Ralph E. Wiatrowski (see attached). However, through a clerical oversight, it was never officially added to the **Kenedy Directory**. Undersigned further states that the above-mentioned has been classified as an organization that is not a private foundation as defined in Section (509)(a) of the Internal Revenue Code. This is based on a blanket ruling issued by the Internal Revenue Service on December 11, 1970. Undersigned further states that any contribution to the aforesaid is tax deductible under Code Section 170 of the Internal Revenue Service Act. Undersigned further states that the aforesaid has Federal Group Exemption No. 0928.

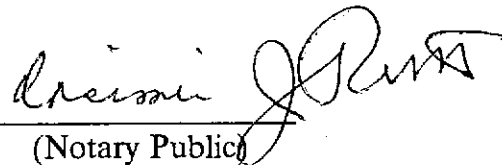
Undersigned further saith not.



(John J. Wright, Financial  
Secretary, Catholic Diocese of  
Cleveland)

STATE OF OHIO - CUYAHOGA COUNTY: ss.

Sworn to before me and subscribed in my presence this 11th day of October,  
1991.

  
(Notary Public)

Casimir J. Rutt, Attorney At Law  
Notary Public - State of Ohio  
My commission has no expiration date.  
Section 147.03 R.C.

Internal Revenue Service

Department of the Treasury

District  
Director

Baltimore District

31 Hopkins Plaza, Baltimore, Md. 21201

Telephone: (410) 962-6058

JUN 01 1992

▷  
Mr. Mark E. Chopko  
General Counsel  
United States Catholic Conference  
3211 4th Street, N.E.  
Washington, D.C. 20017-1194

Dear Mr. Chopko:

In a ruling dated March 25, 1946, we held that the agencies and instrumentalities and all educational, charitable and religious institutions operated, supervised, or controlled by or in connection with the Roman Catholic Church in the United States, its territories or possessions appearing in the Official Catholic Directory for 1946, are entitled to exemption from federal income tax under the provisions of section 101(6) of the Internal Revenue Code of 1939, which corresponds to section 501(c)(3) of the 1986 Code. This ruling has been updated annually to cover the activities added to or deleted from the Directory.

The Official Catholic Directory for 1992 shows the names or addresses of all agencies and instrumentalities and all educational, charitable, and religious institutions operated by the Roman Catholic Church in the United States, its territories and possessions in existence at the time the Directory was published. It is understood that each of these is a non-profit organization, that no part of the net earnings thereof inures to the benefit of any individual, that no substantial part of their activities is for promotion of legislation, and that none are private foundations under section 509(a) of the Code.

Based on all information submitted, we conclude that the agencies and instrumentalities and educational, charitable, and religious institutions operated, supervised or controlled by or in connection with the Roman Catholic Church in the United States, its territories or possessions appearing in the Official Catholic Directory for 1992 are exempt from federal income tax under section 501(c)(3) of the Code.

Donors may deduct contributions to the agencies, instrumentalities and institutions referred to above, as provided by section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to them or for their use are deductible for federal estate and gift tax purposes under sections 2055, 2106, and 2522 of the Code.

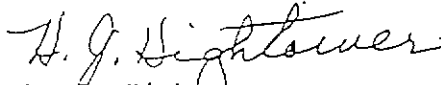
Mr. Mark E. Chopko

Beginning January 1, 1984, unless specifically excepted, you and your subordinates must pay tax under the Federal Insurance Contributions Act (Social Security taxes) for each employee who is paid \$100 or more in a calendar year. You and your subordinates are not liable for tax under the Federal Unemployment Tax Act (FUTA).

Next year, within 90 days before the close of your annual accounting period, or by May 31, the date established by our letter of April 28, 1975, which gave an extension of time to file the information, please send one copy of the Official Catholic Directory of 1993 for each Internal Revenue District in which one or more of your subordinates are located, with four additional copies to this office.

The conditions concerning the retention of your group exemption as set forth in our previous determination letter of August 17, 1983 remain in full force and effect.

Sincerely yours,

  
H. G. Hightower  
District Director