



Sheffield Hale
Chief Counsel

January 15, 2010

Senator Charles E. Grassley
United States Senate
Committee on Finance
Washington, D.C. 20510-6200

ATTN: Paul Thacker and Brian Downey

Dear Senator Grassley:

This letter responds to the Senate Finance Committee's December 7, 2009, request for information on funding received by the American Cancer Society, Inc., (the "Society") from pharmaceutical companies, medical device companies, foundations established by these companies, and the insurance industry ("PMI Funders"). As will be explained below, the Society receives less than 1.5 percent of its total income from PMI Funders.

The Society holds itself to the highest standards of transparency and public accountability in its continuing quest to save lives by eliminating cancer as a major health problem. At the start of this new year, it is worth remembering that in 2010, nearly 600,000 Americans are expected to die of cancer. That is more than 1,500 deaths a day. Furthermore, an estimated 1.5 million Americans will receive a diagnosis of cancer during the same period. That means more than 4,500 Americans will hear their doctors say, "You have cancer," each and every day this year. These statistics underscore the importance of the battle against cancer. As the nation's largest voluntary health organization, the Society knows that it cannot fight this disease without maintaining the highest standards of stewardship that are essential to give Americans confidence in the integrity of our organization.

The Society will celebrate its 100th birthday in 2013, and that is, in part, due to its long and successful commitment to public accountability and responsible stewardship of donor resources. Given this organizational ethic, the Society is highly responsive to current governmental and public concerns about appropriate use of tax-deductible contributions. Accordingly, the Society over time has adopted a series of enhancements to its Board governance and operational policies and procedures intended to reflect nonprofit sector best practices and new transparency

guidelines for charitable organizations. Below, in response to the Committee's request for information, we explain these in detail and also discuss the attached accounting of industry funding.

At the outset, however, we would like to provide information that we believe provides context responsive to the Committee's concerns about the relationship between our organization and PMI Funders. Specifically, we will discuss sources of the Society's funding and governance practices that safeguard individual donor dollars.

Financial Support of the American Cancer Society

Donor confidence is essential to the Society's success. The overwhelming majority of the Society's financial support comes directly from voluntary contributions from the public at large. Here are some recent statistics:

- In 2009, 6.9 million donors made more than 9 million gifts to the Society, with an average gift size of \$67, excluding planned gifts. More than 6.6 million of those 6.9 million donors (95.7 percent) were individuals, approximately 325,000 donors were corporations, and approximately 6,000 were charitable foundations.
- The Society raised approximately 59 percent of its 2009 revenue through community-based special events by leveraging the talents and commitment of individual volunteers and participants, including:
 - 5,034 American Cancer Society Relay For Life[®] events, which raised more than \$386 million, with an estimated 3.5 million participants – including more than 700,000 cancer survivors.
 - More than 140 Making Strides Against Breast Cancer[®] events which raised more than \$50 million, with an estimated 600,000 participants and 55,000 survivors.

Between 2006 and 2009, less than half of 1 percent of all corporate donors to the Society were PMI Funders, and their contributions accounted for less than 1.5 percent of the Society's total income.¹ The Society accepts this support according to the specific policies and procedures described below that apply to all corporate contributions to ensure that funding will be used to pursue the Society's lifesaving mission.

¹ In describing financial support, we define the Society broadly to include ACS, Inc. and its related organizations. ACS, Inc., is a national organization with affiliated Divisions, a foundation, and an affiliated 501(c)(4) organization. To provide complete transparency, we have included industry funding provided not only to ACS, Inc., as you requested, but also industry funding provided to organizations affiliated with ACS, Inc. They include: The American Cancer Society Foundation, American Cancer Society California Division, Inc., American Cancer Society Eastern Division, Inc., American Cancer Society Florida/Puerto Rico Division, Inc., American Cancer Society Great Lakes Division, Inc., American Cancer Society Great West Division, Inc., American Cancer Society High Plains Division, Inc., American Cancer Society Illinois Division, Inc., American Cancer Society Mid-South Division, Inc., American Cancer Society Midwest Division, Inc., American Cancer Society New England Division, Inc., American Cancer Society Ohio Division, Inc., American Cancer Society Pennsylvania Division, Inc., American Cancer Society South Atlantic Division, Inc., and American Cancer Society Cancer Action Network, Inc.

It is important to note that not one of the nearly 325,000 corporate donors is a tobacco company. The Society has an absolute prohibition on accepting support from the tobacco industry. This prohibition is aligned with the Society's mission: since the first Surgeon General's report on smoking and health in 1964, there have been more than 12 million premature deaths attributed to smoking in the United States.

Governance Practices

The Society is committed to transparency and accountability as a means to safeguard donor dollars. To that end, the Society regularly monitors and implements, where appropriate, guidance offered by nonprofit associations, such as Independent Sector, and by the Internal Revenue Service. The Society currently follows the practices reflected in Part VI of Form 990, the IRS discussion of Governance and Related Topics for 501(c)(3) Organizations, and the Principles for Good Governance and Ethical Practice set forth by the Panel on the Nonprofit Sector.

For example, the Society's Code of Ethics (which is attached under Exhibit B) provides for annual disclosure of financial interests in any business that engages in financial transactions with the Society. The Society has also adopted a document retention policy and provides protection for whistleblowers. In addition, the Society makes public on its Web site its governing documents, its Form 990, and its financial statements. The Society's Audit Committee, which is responsible for reviewing conflict of interest issues, is composed entirely of independent directors. Furthermore, the Society's Board of Directors is composed entirely of independent volunteer citizen members and is organized to facilitate active Board oversight of the Society's operations and finances.

Accounting of Industry Funding

The Committee has requested an accounting of funding provided to the Society by pharmaceutical companies, medical device companies, foundations established by these companies, and the insurance industry between 2006 and 2009.

The Society received nearly \$4 billion in total income between 2006 and 2009, of which \$58,227,286 was contributed by PMI Funders, representing less than 1.5 percent of the Society's total income over this period.

Under Exhibit A, we have attached a list of the PMI Funders that have supported the Society and its related organizations over the past four years, along with the amount, date, and purpose of each contribution. As specified in your request, in compiling this data, we defined the term "industry funding" to mean any transfer of value, including but not limited to grants, donations, and sponsorship for meetings or programs, etc. We have included aggregate contributions for those companies with less than \$20,000 in donations on page 7 of Exhibit A under Other Pharmaceutical, Medical Device Companies, Foundations, and Insurance Companies². We believe this data materially satisfies the Committee's request.

² We interpreted your request for insurance companies to mean all types of insurance companies, including health insurance, life insurance, property, and casualty insurance companies.

Policies

The Committee has asked a number of questions about the Society's policies with respect to industry funding, transparency, and outside income. Below, we have reproduced your questions and provided our responses.

Industry Funding

- 1. Please describe the policies for accepting industry funding and whether or not the American Cancer Society allows companies to place restrictions or provide guidance on how funding will be spent.**
- 2. If the Society allows companies to place restrictions on industry funding, then please explain all restrictions and/or guidance for each transfer of value from industry. For every transfer of value with a restriction, please provide the following information: year of transfer, name of company, and restriction placed on funding.**

The Society's long-standing position on acceptance of industry funding is set forth in its Policy on Corporate Relationships, which is attached under Exhibit C. Consistent with long-standing practice, the Society solicits and accepts restricted contributions only for purposes that meet its specified mission delivery program guidelines or priorities. The Society is an accredited member in good standing of the National Health Council because its policies and practices meet the National Health Council Standards of Excellence. These standards demand the highest level of accountability and ethical practice to assure the public that the organizations meeting these standards are worthy of support. For a detailed listing of the National Health Council's Standards of Excellence for voluntary health agencies, please visit www.nationalhealthcouncil.org/forms/soe.pdf.

As shown in the data provided of industry funding under Exhibit A, approximately 60 percent of contributions by PMI Funders are accepted subject to restrictions on use. Detail with respect to each transfer (year of transfer, name of company, and restriction placed on funding) is included under Exhibit A. Below we explain each of the listed restrictions on use, which fall into the following twelve categories:

- **Breast cancer – general.** Restricted donations in this category are used to support the Society's work to eradicate breast cancer, including research, patient services, and prevention and early detection programs.
- **Camps for children with cancer.** Restricted donations in this category are used to support the Society's free summer camps for children with cancer. Staffed by pediatric oncologists and nurses, these camps provide a place for children in treatment or remission to become kids again through the summer camp experience.
- **Cancer prevention and early detection.** Restricted donations in this category are used to support the Society's cancer prevention and early detection efforts. The Society's prevention programs focus primarily on: tobacco control; the relationship between diet, physical activity, and cancer; promoting coordinated school health programs; and reducing the risk of skin cancer. Programs are designed to help adults and children make health-enhancing decisions and act on them. The Society also seeks, through the dissemination of its early

cancer detection guidelines and its cancer detection and advocacy programs, to ensure that cancer is diagnosed at the earliest possible stage, when there is the greatest chance of successful treatment.

- **Geographic.** Restricted donations in this category are used to support the Society's work in specific geographic areas.
- **Hope Lodge®.** Restricted donations in this category are used to support the Society's Hope Lodge facilities, which provide a free, supportive place to call "home" for cancer patients and their families during treatment. Getting the right care sometimes means that cancer patients must travel far from home, often to a cancer treatment facility in another city, adding the additional burden of transportation, hotel, and meal expenses. Many cancer patients are forced to go into debt, or take their second or third choice of treatment simply because the cost of travel is too great. Currently, there are 29 Hope Lodge locations throughout the United States.
- **Nutrition and physical activity programs.** Restricted donations in this category are used to support the Society's nutrition and physical activity programs, including research and education. For example, every five years the Society publishes nutrition and physical activity guidelines, which are developed by a national panel of experts in cancer research, prevention, epidemiology, public health, and policy, and as such, they represent the most current scientific evidence related to dietary and activity patterns and cancer risk.
- **Patient Navigation Programs.** Restricted donations in this category are used to support the Society's Patient Navigator Programs, which provide guidance for cancer patients, their families, and caregivers to help them through the cancer treatment experience, with a focus on identifying and eliminating barriers to cancer care for the medically underserved. Patient navigators serve as personal guides by providing information, day-to-day help, and emotional support.
- **Patient services.** Restricted donations in this category are used to support the Society's patient services programs, which provide a wide range of emotional and practical support for patients, their families, their caregivers, and their communities from the time of diagnosis to the end of the cancer experience. For example, the Road to Recovery® program provides transportation to and from treatment for people who have cancer and do not have a ride or are unable to drive themselves.
- **Scientific research.** Restricted donations in this category are used to support the Society's research program, which includes both external grants and in-house cancer research. With its external grants, the Society – which is the nation's largest private, not-for-profit source of funds for scientists studying cancer – focuses its funding on investigator-initiated, peer-reviewed proposals. The success of the Society's grant program is perhaps best illustrated by the fact that 44 grant recipients have gone on to win the Nobel Prize. The Society also conducts in-house cancer research in a wide variety of areas, including epidemiology and behavioral and psychosocial research.
- **Tobacco control.** Restricted donations in this category are used to support the Society's wide-ranging tobacco control efforts, which include everything from research and education to policy work and direct patient services.

- **Youth cancer survivor scholarships.** Restricted donations in this category are used to support the Society's youth cancer survivor college scholarship program, which is a scholarship opportunity exclusively for students with a history of cancer. The program provides young cancer patients/survivors assistance in pursuing higher education from an accredited school.
- **Other program restrictions.** Restricted donations in this category, approximately \$782,638 (1% of the total), are used to support miscellaneous Society activities that do not fit into any of the other categories such as our health insurance assistance service, clinical trials matching service, and pain awareness.

Transparency

- 3) **Please explain what policies, if any, that the American Cancer Society plans to adopt to ensure transparency of funding in order to provide a greater public trust in the independence of your organization.**

As discussed above, the Society has worked hard to maintain the public trust by exercising responsible stewardship over contributions and by adopting governance practices that encourage public confidence in charitable organizations. The Society either meets or exceeds the standards established by numerous charitable "watchdog" agencies. The Society holds the Better Business Bureau national charity seal of approval and is accredited by the Bureau's Wise Giving Alliance for satisfying Standards for Charitable Accountability, which are available at www.bbb.org/us/Charity-Standards. The seal provides the public with a clear, concise, and easily recognizable symbol that the subject national charity adheres to the Alliance's strong and comprehensive standards.

In addition, as noted above, the Society meets the National Health Council Standards of Excellence, which signal that the Society satisfies the highest levels of accountability and ethical practice and is worthy of support. Additionally, the Society's Board Audit Committee and its Governance Committee are both charged with the continuing responsibility to consider additional policies and emerging procedures as may prove necessary to protect against conflict of interest and inappropriate influence. The Society will continue to monitor the evolution of best practices in governance in the nonprofit sector and will adopt practices that are appropriate for the Society and that foster continued public confidence in its independence.

Outside Income

- 4) **Please explain your policies on disclosure of outside income by your top executives and board members.**
- 5) **Please provide the disclosures of outside income filed with your organization by your top executives and board members.**

The Society requires all employees and directors to comply with its Code of Ethics (Exhibit B), including the Conflict of Interest Policy. The policy is designed to ensure that the Society benefits from the undivided loyalty of its staff and directors, while recognizing that these individuals will have relationships and obligations outside the Society. In order to prevent any

such relationships or obligations from influencing their decisions at the Society, the policy requires all Board members and staff to disclose, at least annually, any position that would result in a conflict of interest or the appearance of a conflict of interest. Hence, all directors and executives must disclose sources of income that would interfere with their duties to the Society. This information is used by the Board Audit Committee, as well as by the Office of Chief Counsel, to identify circumstances where an individual decision maker should be recused from the Society's decision-making process. Thus, this practice appropriately balances the Society's interests with the outside commitments of its directors and staff.

Staff who earn outside income, such as honoraria, fees, or commissions while working on Society-compensated time are, of course, required to turn that income over to the Society. The Society has not adopted a formal policy requiring disclosure of outside income by its top executives and Board members. Instead, it has relied on its Conflict of Interest Policy, which mandates disclosure of the relationships that may create conflicts of interests rather than on disclosure of all outside income. The policy has been reviewed and approved by the Society's Board of Directors, which retains ultimate responsibility for ensuring responsible stewardship of Society funds.

The Board takes its responsibility for ensuring organizational transparency and accountability seriously and has created a Governance Committee to consider whether the Society's governance procedures are consistent with evolving nonprofit best practices. In light of emerging best practices, the Board's Governance Committee will be considering additional protections, including whether the Society should adopt a formal policy on disclosure from its Board members of outside income and stock ownership from PMI Funders.

In direct response to your inquiry, the Society's Chief Executive Officer solicited detailed information from all of the Society's employed "Disqualified Persons"³ and its key medical and scientific executives with respect to sources of outside income and stock ownership information (other than diversified independently managed investment vehicles such as mutual funds) with and from PMI Funders. Only one income relationship between a PMI Funder and any of those individuals was reported. This individual, who joined the Society in January 1, 2009, had a two year pre-existing relationship with a biotech company where he serves as a scientific advisor with a yearly stipend of \$48,000.

Only one individual reported stock ownership in PMI Funders in excess of \$10,000. The individual has holdings in two large publicly traded companies with a current value between \$10,000 and \$40,000. The Society has adopted a policy to provide that all employed Disqualified Persons and medical and scientific executives must receive approval from the Chief Executive Officer, Chief Medical Officer, and Chief Counsel prior to entering into any income relationship with a third party and to prohibit any compensated relationship with a PMI Funder. The Society will continue to annually solicit detailed information on outside income and stock ownership from these executives.

³ As defined in IRC 26 U.S.C. § 4958(f)(1).

The American Cancer Society has never taken for granted the trust and generous support of the American public – trust that it has earned and received for nearly a century. It is with that trust in mind that the Society routinely evaluates emerging standards and best practices in the areas of nonprofit governance and public accountability. Our organization remains committed to playing a leadership role in the independent, nonprofit sector and in our civil society. We hope these responses have satisfied the Committee's questions.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Sheffield Hale". The signature is written in a cursive, flowing style.

F. Sheffield Hale

Enclosures

Exhibits

- A. Funding from pharmaceutical companies, medical device companies, foundations established by these companies, and the insurance industry
- B. Code of Ethics and Conflict of Interest Policy, American Cancer Society, Inc., and Its Affiliated Entities
- C. Policy on Corporate Relationships

Exhibit A

COMPANY NAME	Gift Calendar Year				Grand Total
	2006	2007	2008	2009	
ABBOTT LABORATORIES	251	30	1,471	1,830	1,752
BREAST CANCER - GENERAL	1,874	900	6,650	11,354	1,930
GEOGRAPHIC		5,500	3,162	1,584	10,256
HOPE LODGE			1,000		1,000
OTHER PROGRAM RESTRICTIONS			50		50
SCIENTIFIC RESEARCH	223,083	277,837	506,933	51,263	1,059,116
UNRESTRICTED DONATIONS	225,208	284,267	519,265	54,788	1,083,528
ABBOTT LABORATORIES Total					
ACTELION PHARMACEUTICALS		2,650	5,000		7,650
BREAST CANCER - GENERAL		10,000	13,532		23,532
UNRESTRICTED DONATIONS		12,650	18,532		31,182
ACTELION PHARMACEUTICALS Total					
ACUITY INSURANCE		23,000	40,000	65,000	128,000
AEGON	50,000				50,000
AETNA	17,960	10,210	35,480	9,739	73,390
BREAST CANCER - GENERAL			42	25,042	25,084
CAMPS FOR CHILDREN WITH CANCER	1,607		6,000		7,607
GEOGRAPHIC	740	1,689	292	36	2,757
HOPE LODGE	168	234	2,503		2,936
SCIENTIFIC RESEARCH				2,000	2,000
TOBACCO CONTROL	212,557	172,890	166,109	41,031	592,586
UNRESTRICTED DONATIONS	233,031	185,022	210,426	77,880	706,360
AETNA Total					
ALLIANZ		10,000	20,000	24,000	54,000
UNRESTRICTED DONATIONS		2,000	3,000	500	5,500
BREAST CANCER - GENERAL				1,000	1,000
CAMPS FOR CHILDREN WITH CANCER	50	27,550	14,250	18,500	60,350
UNRESTRICTED DONATIONS	50	29,550	17,250	20,000	66,850
ALLSTATE FOUNDATION Total					
ALLSTATE INSURANCE COMPANY	605	3,910	1,275	1,050	6,840
BREAST CANCER - GENERAL	631	646	365	58	1,703
CAMPS FOR CHILDREN WITH CANCER			20		20
HOPE LODGE				100	100
PATIENT NAVIGATION PROGRAMS	69,919	61,940	80,388	95,952	308,198
UNRESTRICTED DONATIONS	71,155	66,499	82,048	97,159	316,861
ALLSTATE INSURANCE COMPANY Total					
AMERICAN FAMILY INSURANCE	525		25	275	825
BREAST CANCER - GENERAL	42,000		28,000	28,000	98,000
GEOGRAPHIC	510	300			810
HOPE LODGE	33,066	70,035	36,716	32,852	172,668
UNRESTRICTED DONATIONS	76,131	70,335	64,741	61,127	272,333
AMERICAN FAMILY INSURANCE Total					
AMERICAN FAMILY LIFE ASSURANCE COMPANY OF COLUMBUS (AFLAC)	1,000	120	2,500	2,000	5,620
BREAST CANCER - GENERAL	45,094	21,669	1,000	27,216	94,979
UNRESTRICTED DONATIONS	46,094	21,789	3,500	29,216	100,599
AMERICAN FAMILY LIFE ASSURANCE COMPANY OF COLUMBUS (AFLAC) Total					
AMERICAN INTERNATIONAL GROUP (AIG)				125	125
BREAST CANCER - GENERAL			100		100
SCIENTIFIC RESEARCH	25,800		5,000	14,850	45,650
UNRESTRICTED DONATIONS	25,800		5,100	14,975	45,875
AMERICAN INTERNATIONAL GROUP (AIG) Total					
AMERICAN PHARMACEUTICAL PARTNERS	125				125
BREAST CANCER - GENERAL	1,000				1,000
PATIENT SERVICES	10,297	4,636	6,026	775	21,734
UNRESTRICTED DONATIONS	11,422	4,636	6,026	775	22,859
AMERICAN PHARMACEUTICAL PARTNERS Total					
AMGEN	4,280	3,716	5,825	950	14,781
BREAST CANCER - GENERAL		200	2,500		2,700
CAMPS FOR CHILDREN WITH CANCER					

COMPANY NAME	Gift Calendar Year					Grand Total
	2007	2008	2009	2010	2011	
DONATION RESTRICTION	10,000	15,000	15,500	15,500	40,500	
GEOGRAPHIC		3,000	5,200	8,300	100	
HOPE LODGE		5,000			5,000	
OTHER PROGRAM RESTRICTIONS	700	36,000	21,500	102,200	160,400	
PATIENT SERVICES		300			300	
SCIENTIFIC RESEARCH	185,921	100,776	103,294	143,138	533,129	
UNRESTRICTED DONATIONS	200,911	163,992	153,819	246,388	765,110	
AMGEN Total						
BREAST CANCER - GENERAL	155	450	1,050	485	2,140	
GEOGRAPHIC	2,500	2,500	2,500	2,500	10,000	
UNRESTRICTED DONATIONS	12,497	15,778	10,413	10,911	49,599	
ASSURANT Total	15,152	18,728	13,963	13,896	61,739	
ASTRAZENECA	74,100	66,037	28,500	38,910	207,547	
BREAST CANCER - GENERAL		2,000			2,000	
CAMPS FOR CHILDREN WITH CANCER		250			250	
CANCER PREVENTION & EARLY DETECTION	3,000				3,000	
GEOGRAPHIC	7,000,000	833	14,750	5,000	7,020,383	
HOPE LODGE	16,000	12,500	10,000	3,000	41,500	
OTHER PROGRAM RESTRICTIONS		2,001,500	3,005,000	1,023,700	6,030,200	
PATIENT NAVIGATION PROGRAMS		700	700	500	1,900	
PATIENT SERVICES		140,000			140,000	
SCIENTIFIC RESEARCH		2,500	7,500	5,000	15,000	
TOBACCO CONTROL		178,150	158,028	90,070	708,796	
UNRESTRICTED DONATIONS	280,550	2,400,820	3,219,476	1,166,180	14,161,076	
ASTRAZENECA Total						
BREAST CANCER - GENERAL	500	25,000	25,775	25,638	76,413	
UNRESTRICTED DONATIONS	500	25,000	25,775	25,638	76,913	
AURORA IMAGING TECHNOLOGY Total						
HOPE LODGE		25,000	25,000	25,000	75,000	
BAXTER INTERNATIONAL		12,400			12,400	
BREAST CANCER - GENERAL	150	600		3,050	3,800	
GEOGRAPHIC		1,300			1,300	
HOPE LODGE	11,600	27,805	3,480	18,345	61,230	
UNRESTRICTED DONATIONS	11,750	42,105	3,480	21,395	78,730	
BAXTER INTERNATIONAL Total						
BREAST CANCER - GENERAL	1,930	6,732	4,889	2,477	16,028	
SCIENTIFIC RESEARCH		200			200	
UNRESTRICTED DONATIONS	32,265	35,139	43,227	37,855	148,486	
BAXTER INTERNATIONAL FOUNDATION Total	34,195	42,071	48,116	40,332	164,714	
BAYER				209	209	
BREAST CANCER - GENERAL				100	100	
CAMPS FOR CHILDREN WITH CANCER						
CANCER PREVENTION & EARLY DETECTION	150,000				150,000	
PATIENT SERVICES	250	700	1,700		2,400	
UNRESTRICTED DONATIONS	150,250	24,700	6,750		29,300	
BAYER Total				309	182,009	
BECKMAN COULTER	687	2,830			3,517	
BREAST CANCER - GENERAL	10,000	25,000	25,000	25,000	85,000	
YOUTH CANCER SURVIVOR SCHOLARSHIPS	7,984	34,680	41,127	20,139	103,930	
UNRESTRICTED DONATIONS	18,671	62,510	66,127	45,139	192,447	
BECKMAN COULTER Total						
BREAST CANCER - GENERAL	1,255	2,105	2,175	1,635	7,170	
HOPE LODGE	1,000				1,000	
UNRESTRICTED DONATIONS	10,508	20,525	63,873	65,492	160,397	
BECTON, DICKINSON AND COMPANY Total	12,763	22,630	66,048	67,127	168,567	
BIOGEN IDEC	11,201	11,366	1,409	1,125	25,101	

COMPANY NAME	DONATION RESTRICTION	Gift Calendar Year				Grand Total
		2007	2008	2009	2009	
BIODEN IDEC FOUNDATION	HOPE LODGE	33,334		33,333	33,333	100,000
BLUE CROSS BLUE SHIELD	BREAST CANCER - GENERAL	84,305	110,300	144,048	57,547	396,200
	CANCER PREVENTION & EARLY DETECTION	7,000				12,000
	GEOGRAPHIC	35,000	3,000	5,000		37,500
	HOPE LODGE	2,500			3,364	6,364
	PATIENT NAVIGATION PROGRAMS	56,000		238,000	51,000	345,000
	SCIENTIFIC RESEARCH	74			100	174
	TOBACCO CONTROL	45,000				45,000
	YOUTH CANCER SURVIVOR SCHOLARSHIPS	10,000			25,000	35,000
BLUE CROSS BLUE SHIELD Total	UNRESTRICTED DONATIONS	431,575	373,828	635,039	403,560	1,844,021
	UNRESTRICTED DONATIONS	585,128	573,454	1,022,087	540,591	2,721,260
BLUE CROSS BLUE SHIELD FOUNDATION	HOPE LODGE	150,000		550,000		550,000
	PATIENT NAVIGATION PROGRAMS					150,000
	UNRESTRICTED DONATIONS	150,000		550,000	120,000	820,000
BLUE CROSS BLUE SHIELD FOUNDATION Total	UNRESTRICTED DONATIONS	12,750	11,500	14,200	12,000	50,450
BOEHRINGER INGELHEIM PHARMACEUTICAL	GEOGRAPHIC	2,500				2,500
	UNRESTRICTED DONATIONS	6,670	16,382	4,589	2,775	30,416
BOSTON SCIENTIFIC CORPORATION	UNRESTRICTED DONATIONS	9,170		4,589	2,775	32,916
BOSTON SCIENTIFIC CORPORATION Total						
BRISTOL-MYERS SQUIBB	BREAST CANCER - GENERAL	3,971	5,100	2,631	1,685	13,396
	GEOGRAPHIC	51,000	391,330	166,200	175,000	772,530
	HOPE LODGE	203,000	501,500	200,000	12,500	917,000
	PATIENT SERVICES	700		16,300	1,300	18,300
	UNRESTRICTED DONATIONS	111,424	70,769	43,024	50,787	276,004
BRISTOL-MYERS SQUIBB Total	UNRESTRICTED DONATIONS	369,394	969,399	417,155	241,282	1,997,230
CALGENE	PATIENT SERVICES	700		5,700	750	7,850
	UNRESTRICTED DONATIONS				25,000	25,000
CALGENE Total	UNRESTRICTED DONATIONS	700	700	5,700	25,750	32,850
CARDINAL HEALTH	BREAST CANCER - GENERAL	8,463	1,439	6,052	5,443	21,998
	OTHER PROGRAM RESTRICTIONS				30	30
	PATIENT NAVIGATION PROGRAMS				25,000	25,000
	PATIENT SERVICES	750		700		1,450
	UNRESTRICTED DONATIONS	74,921	77,110	89,014	76,683	369,099
CARDINAL HEALTH Total	UNRESTRICTED DONATIONS	127,645	127,645	95,068	107,156	406,977
CENTOCOR ORTHO BIOTECH	PATIENT SERVICES		1,700		1,500	3,200
	UNRESTRICTED DONATIONS				30,000	30,000
CENTOCOR ORTHO BIOTECH Total	UNRESTRICTED DONATIONS		1,700		31,500	33,200
CIGNA	BREAST CANCER - GENERAL	150				150
	SCIENTIFIC RESEARCH	75				75
	UNRESTRICTED DONATIONS	28,385	28,460	6,750	675	35,890
CIGNA Total	UNRESTRICTED DONATIONS	6,900		675	80	36,115
CITICORP	UNRESTRICTED DONATIONS	5,863		8,775	8,153	15,139
CNA	BREAST CANCER - GENERAL	4,855	2,446	5,259	2,493	15,053
	OTHER PROGRAM RESTRICTIONS			2,500		2,500
	UNRESTRICTED DONATIONS	30,528	32,974	25,215	34,301	113,742
CNA Total	UNRESTRICTED DONATIONS	30,070	30,070	31,458	36,794	131,295
COVIDIEN	BREAST CANCER - GENERAL	500		4,421	8,030	12,951
	HOPE LODGE				360	360

COMPANY/NAME	DONATION/RESTRICTION	Gift Calendar Year				Grand Total
		2006	2007	2008	2009	
	PATIENT SERVICES			10,000	10,000	20,000
	SCIENTIFIC RESEARCH					215
	UNRESTRICTED DONATIONS	10,000	500	24,107	32,341	66,948
COVIDIEN Total		10,000	1,000	38,529	50,946	100,475
EASTMAN KODAK	GEOGRAPHIC	75,000				75,000
ELI LILLY AND COMPANY	BREAST CANCER - GENERAL	850	3,195	2,554	950	7,549
	CAMPS FOR CHILDREN WITH CANCER			25		25
	HOPE LODGE	15,746	5,000	10,906	3,115	34,767
	PATIENT SERVICES	1,000	1,700	700	700	4,100
	SCIENTIFIC RESEARCH		135		600	735
	YOUTH CANCER SURVIVOR SCHOLARSHIPS			2,500		5,000
	UNRESTRICTED DONATIONS	61,537	81,112	76,580	78,599	297,828
ELI LILLY AND COMPANY Total		79,134	91,142	93,285	86,464	350,005
EMD SERONO	BREAST CANCER - GENERAL	5,025	30,000	46,310	15,000	96,335
	SCIENTIFIC RESEARCH			140,000		140,000
	UNRESTRICTED DONATIONS	1,650	25,000	104,100	126,163	266,913
EMD SERONO Total		6,675	55,000	280,410	141,163	483,248
ENDO PHARMACEUTICALS	BREAST CANCER - GENERAL		30			30
	HOPE LODGE			25,000		25,000
	OTHER PROGRAM RESTRICTIONS	2,500			500	3,000
	UNRESTRICTED DONATIONS	5,000	100	2,675	2,025	9,800
ENDO PHARMACEUTICALS Total		7,500	130	27,675	2,525	37,830
FARM BUREAU	BREAST CANCER - GENERAL	3,000	4,560	6,775	25	14,360
	PATIENT SERVICES			700		700
	UNRESTRICTED DONATIONS	89,380	76,940	73,639	89,847	329,805
FARM BUREAU Total		92,380	81,500	81,114	89,872	344,865
FIDELITY INVESTMENTS	BREAST CANCER - GENERAL			200		200
	CAMPS FOR CHILDREN WITH CANCER			100		100
	GEOGRAPHIC		100			100
	HOPE LODGE		6,000	100		6,100
	SCIENTIFIC RESEARCH		50			50
	UNRESTRICTED DONATIONS	68,090	33,650	61,125	8,550	171,415
FIDELITY INVESTMENTS Total		68,090	39,800	61,525	8,550	177,965
GE HEALTHCARE	GEOGRAPHIC	21,000	50,000	40,000		111,000
	UNRESTRICTED DONATIONS	14,050	20,000	28,000	5,260	65,310
GE HEALTHCARE Total		35,050	70,000	68,000	5,260	176,310
GENENTECH	BREAST CANCER - GENERAL	461	2,220	22,877	29,875	55,533
	OTHER PROGRAM RESTRICTIONS	1,121	150		500,000	601,271
	PATIENT SERVICES	3,000		6,700	5,700	15,400
	SCIENTIFIC RESEARCH	55,000				55,000
	UNRESTRICTED DONATIONS	45,753	465,010	109,147	88,485	708,395
GENENTECH Total		105,335	467,380	138,824	624,060	1,335,599
GLAXOSMITHKLINE	BREAST CANCER - GENERAL	31,012	23,776	23,755	5,825	84,368
	CAMPS FOR CHILDREN WITH CANCER	500	500	500		1,500
	GEOGRAPHIC	1,086	7,000	1,106	1,500	10,692
	HOPE LODGE	300,100	25,000	480		325,580
	OTHER PROGRAM RESTRICTIONS	18,000	5,000	10,000		33,000
	PATIENT SERVICES	1,700		700		3,100
	SCIENTIFIC RESEARCH	50				50
	UNRESTRICTED DONATIONS	264,687	162,128	126,793	323,984	877,592
GLAXOSMITHKLINE Total		617,135	223,404	163,334	332,008	1,335,882

COMPANY NAME	Gift Calendar Year				Grand Total
	2006	2007	2008	2009	
HEALTH ALLIANCE MEDICAL PLANS					
HEALTH ALLIANCE MEDICAL PLANS Total	15,095	17,819	1,500	1,500	3,000
HEALTH CARE SERVICE CORPORATION	15,095	17,819	20,000	17,800	70,514
HEALTH CARE SERVICE CORPORATION Total	20	10,000	22,735	9,500	42,255
HEALTH NET	50,225	45,171	125,675	39,950	281,021
HENRY SCHEIN	50,245	55,171	148,410	48,450	303,276
HOLOGIC	10,340	8,900	2,420	1,289	22,949
HOLOGIC Total				100,000	100,000
HOSPIRA	4,739	6,500	931	387	12,557
HUMANA	350,000	150,000	50,000	50,000	550,000
IDEC PHARMACEUTICAL	1,533	2,623	4,155	20,000	28,311
JOHNSON & JOHNSON	356,272	159,123	5,086	70,387	590,868
KAISER FOUNDATION	20,888	45,450	40,549	36,988	143,875
KAISER FOUNDATION Total	20,888	65,489	55,678	37,352	179,207
KAISER PERMANENTE	700		2,060		2,760
KAISER PERMANENTE Total	5,000	5,000	5,000		10,000
KAISER PERMANENTE Total	41,953	38,926	24,530	26,794	132,203
KAISER PERMANENTE Total	48,653	38,926	31,580	26,794	145,963
KAISER PERMANENTE Total	50,000				50,000
KAISER PERMANENTE Total	33,887	32,841	46,718	31,175	144,421
KAISER PERMANENTE Total	200				200
KAISER PERMANENTE Total	56	6,000	10,000	238,000	254,000
KAISER PERMANENTE Total	200	50			106
KAISER PERMANENTE Total	400	550	300		1,250
KAISER PERMANENTE Total	30,000	306,826	366,650	100,000	496,650
KAISER PERMANENTE Total	261,710	306,826	262,231	304,839	1,135,606
KAISER PERMANENTE Total	296,253	376,267	685,899	674,014	2,032,433
KAISER PERMANENTE Total	10,000	15,488	25,919		51,407
KAISER PERMANENTE Total	5,000	13,300	1,000	1,000	2,000
KAISER PERMANENTE Total			50,000	50,000	100,000
KAISER PERMANENTE Total	67,724	61,894	60,657	10,000	10,000
KAISER PERMANENTE Total	82,724	90,682	137,577	109,350	420,333
KAISER PERMANENTE Total				5,000	5,000
KAISER PERMANENTE Total	500,000			2,000	500,000
KAISER PERMANENTE Total	10,875	5,417	1,550	25,000	50,000
KAISER PERMANENTE Total	510,875	5,417	1,550	40,452	558,294
KAISER PERMANENTE Total	1,855	800	4,413	2,414	9,482
KAISER PERMANENTE Total	7,435	13,876	7,788	1,836	9,604
KAISER PERMANENTE Total	9,290	14,876	56,310	49,738	127,359
KAISER PERMANENTE Total			68,491	53,988	146,445

COMPANY NAME	DONATION RESTRICTION	Gift Calendar Year				Grand Total
		2006	2007	2008	2009	
MARSH & MCLENNAN COMPANIES	BREAST CANCER - GENERAL	5,000		9,425	2,450	16,875
	UNRESTRICTED DONATIONS	950		3,300	50	4,300
MARSH & MCLENNAN COMPANIES Total		5,950		12,725	2,500	21,175
MCKESSON CORPORATION	BREAST CANCER - GENERAL		575	750		1,325
	GEOGRAPHIC			7,500		7,500
	OTHER PROGRAM RESTRICTIONS			1,500		1,500
MCKESSON CORPORATION Total		22,668	16,407	9,129	11,700	59,904
	UNRESTRICTED DONATIONS	22,668	16,982	18,879	11,700	70,229
MCKESSON FOUNDATION	BREAST CANCER - GENERAL	600	525			1,125
	UNRESTRICTED DONATIONS	2,250	7,100	12,175	11,747	33,272
MCKESSON FOUNDATION Total		2,850	7,625	12,175	11,747	34,397
MEDTRONIC, INC.	BREAST CANCER - GENERAL			200		200
	OTHER PROGRAM RESTRICTIONS				1,000	1,000
	PATIENT SERVICES			5,000	700	5,700
	SCIENTIFIC RESEARCH	1,500				1,500
	UNRESTRICTED DONATIONS	440	675	3,000	10,300	14,415
MEDTRONIC, INC. Total		440	2,175	8,200	12,000	22,815
MERCK & CO	BREAST CANCER - GENERAL	15,561	44,931	13,009	10,041	83,541
	GEOGRAPHIC	258,870	7,167	13,009	88,500	354,537
	HOPE LODGE	16,000	1,800	13,000	4,500	35,300
	PATIENT SERVICES	700	700	700	1,200	3,300
	SCIENTIFIC RESEARCH	500	2,500			3,000
	UNRESTRICTED DONATIONS	79,734	106,952	100,448	86,253	373,387
MERCK & CO Total		371,365	156,882	134,324	190,493	853,065
METROPOLITAN LIFE INSURANCE COMPANY	BREAST CANCER - GENERAL	11,764	9,108	2,560	3,770	27,202
	CANCER PREVENTION & EARLY DETECTION	1,000,000				1,000,000
	UNRESTRICTED DONATIONS	274,135	31,910	37,698	8,900	352,643
METROPOLITAN LIFE INSURANCE COMPANY Total		1,285,899	41,018	40,258	12,670	1,379,845
MGI PHARMACEUTICAL	BREAST CANCER - GENERAL		10,000			10,000
	PATIENT SERVICES	1,700				1,700
	UNRESTRICTED DONATIONS	7,850	5,500	500		13,850
MGI PHARMACEUTICAL Total		9,550	15,500	500		25,550
MILLIPORE	BREAST CANCER - GENERAL	917	1,135	2,470	515	5,037
	HOPE LODGE			2,500		2,500
	UNRESTRICTED DONATIONS	1,745	7,635	6,267	8,431	24,078
MILLIPORE Total		2,662	8,770	11,237	8,946	31,615
NEW YORK LIFE INSURANCE COMPANY	BREAST CANCER - GENERAL	950	4,495	748	1,780	7,973
	CAMPS FOR CHILDREN WITH CANCER				25,000	25,000
	SCIENTIFIC RESEARCH	65				65
	UNRESTRICTED DONATIONS	22,533	19,763	18,496	16,441	77,232
NEW YORK LIFE INSURANCE COMPANY Total		23,483	24,323	19,244	43,221	110,270
NORTHWESTERN MUTUAL FOUNDATION	GEOGRAPHIC			15,000		15,000
	SCIENTIFIC RESEARCH	15,000				15,000
	UNRESTRICTED DONATIONS	500	2,000	1,000	18,000	21,500
NORTHWESTERN MUTUAL FOUNDATION Total		500	17,000	16,000	18,000	51,500
NOVARTIS	BREAST CANCER - GENERAL	2,500	3,175	8,103	5,064	18,842
	CANCER PREVENTION & EARLY DETECTION	1,170,000		638,565	92,000	1,900,565
	PATIENT SERVICES	700	700	159,285	112,700	273,385
	UNRESTRICTED DONATIONS	69,961	230,080	495,293	52,293	847,627
NOVARTIS Total		1,243,161	233,955	1,301,226	282,057	3,040,399

COMPANY NAME	DONATION RESTRICTION	Gift Calendar Year				Grand Total
		2006	2007	2008	2009	
ONYX PHARMACEUTICALS	BREAST CANCER - GENERAL			2,500		2,500
	PATIENT NAVIGATION PROGRAMS				5,320	5,320
	PATIENT SERVICES	1,000	700	1,700	500	3,900
	UNRESTRICTED DONATIONS	1,000	1,550	1,000	5,500	9,050
ONYX PHARMACEUTICALS Total		2,000	2,250	5,200	11,320	20,770
OSI FOUNDATION	CAMPS FOR CHILDREN WITH CANCER		40,000	25,000		65,000
	UNRESTRICTED DONATIONS	5,000	5,000	5,000	55,000	70,000
OSI FOUNDATION Total		5,000	45,000	30,000	55,000	135,000
OSI PHARMACEUTICALS	PATIENT SERVICES	700	5,000	5,000	5,000	15,700
	UNRESTRICTED DONATIONS	4,932	11,000	8,953	6,500	31,085
OSI PHARMACEUTICALS Total		5,332	16,000	13,953	11,500	46,785
OTHER PHARMACEUTICAL, MEDICAL DEVICE COMPANIES, FOUNDATIONS, AND INSURANCE COMPANIES	BREAST CANCER - GENERAL	19,334	3,536	13,465	6,379	42,714
	GEOGRAPHIC		13,500			13,500
	HOPE LODGE				21,800	21,800
	OTHER PROGRAM RESTRICTIONS			500	2,250	2,750
	PATIENT SERVICES	18,850	5,400	10,600	12,200	47,050
	SCIENTIFIC RESEARCH				600	600
	UNRESTRICTED DONATIONS	67,957	81,983	95,937	87,026	332,902
OTHER PHARMACEUTICAL, MEDICAL DEVICE COMPANIES, FOUNDATIONS, AND INSURANCE COMPANIES Total		108,141	104,419	120,502	130,256	461,317
OWENS & MINOR	UNRESTRICTED DONATIONS	2,000	5,000	10,000	5,000	22,000
PACIFIC LIFE INSURANCE COMPANY	PATIENT SERVICES	10,000	10,000	10,000	10,000	40,000
	UNRESTRICTED DONATIONS	8,200	10,200	10,200	10,200	38,800
PACIFIC LIFE INSURANCE COMPANY Total		18,200	20,200	20,200	20,200	78,800
PACIFICARE	PATIENT NAVIGATION PROGRAMS	20,000				20,000
	UNRESTRICTED DONATIONS	25,700			3,300	29,000
PACIFICARE Total		45,700			3,300	49,000
PFIZER	BREAST CANCER - GENERAL	31,763	31,766	33,723	10,156	107,408
	CAMPS FOR CHILDREN WITH CANCER	345	300	638	1,283	2,566
	CANCER PREVENTION & EARLY DETECTION		100,000	50,000	373,000	523,000
	GEOGRAPHIC	20,567	42,974	15,734	3,000	82,275
	HOPE LODGE	12,094	460	7,005	37,661	57,220
	OTHER PROGRAM RESTRICTIONS	5,000	20,800		1,000	26,600
	PATIENT NAVIGATION PROGRAMS	5,000	5,000	125,000	700	130,000
	PATIENT SERVICES	6,150	10,050	3,200	18,950	38,350
	SCIENTIFIC RESEARCH		6,971	120	263	7,354
	TOBACCO CONTROL		160,000	30,000	101,298	291,298
PFIZER Total		315,729	481,617	516,667	660,671	1,974,683
PFIZER FOUNDATION	BREAST CANCER - GENERAL				1,234	1,234
	CANCER PREVENTION & EARLY DETECTION	800,000	850,000	775,000		2,425,000
	GEOGRAPHIC		450,000	300,000	575,000	1,325,000
	HOPE LODGE				200	200
	TOBACCO		275,000	325,300	250,000	850,300
PFIZER FOUNDATION Total		800,000	1,575,000	1,400,300	833,352	4,608,652
PHARMACEUTICAL RESEARCH AND MANUFACTURERS OF AMERICA	BREAST CANCER - GENERAL	1,400				1,400
	GEOGRAPHIC	325,055				325,055
	HOPE LODGE				7,500	7,500
	UNRESTRICTED DONATIONS	53,319		277,500	11,000	341,819

COMPANY NAME	DONATION RESTRICTION	Gift Calendar Year				Grand Total
		2007	2008	2009	2010	
PHARMACEUTICAL RESEARCH AND MANUFACTURERS OF AMERICA Total			379,774	277,500	18,500	675,774
PRUDENTIAL FINANCIAL	BREAST CANCER - GENERAL GEOGRAPHIC	24		310		334
		3,500		2,500		8,500
PRUDENTIAL FINANCIAL Total	UNRESTRICTED DONATIONS	33,342		18,536		2,421
		38,868		21,348		4,921
PURDUE PHARMACEUTICAL	BREAST CANCER - GENERAL		2,000	12,820		34,120
	HOPE LODGE		100			100
	OTHER PROGRAM RESTRICTIONS		1,000	95,000		106,000
	UNRESTRICTED DONATIONS		19,000	10,000		45,250
PURDUE PHARMACEUTICAL Total			21,100	117,820		185,470
QUEST DIAGNOSTICS	BREAST CANCER - GENERAL		50,794	18,492		104,488
	CANCER PREVENTION & EARLY DETECTION		1,085			1,085
	GEOGRAPHIC			50		50
	HOPE LODGE			302		302
	OTHER PROGRAM RESTRICTIONS		49	64		113
	SCIENTIFIC RESEARCH		405	434		839
	UNRESTRICTED DONATIONS		446,355	51,836		44,410
QUEST DIAGNOSTICS Total			497,602	71,115		49,187
ROCHE	BREAST CANCER - GENERAL		75	438,748		755,645
	GEOGRAPHIC		149,845	750		208,095
	HOPE LODGE		2,800			2,800
	OTHER PROGRAM RESTRICTIONS		750	300		5,000
	PATIENT SERVICES			1,000		1,000
	SCIENTIFIC RESEARCH			100		325
	UNRESTRICTED DONATIONS		51,325	7,525		12,975
ROCHE Total			204,785	504,073		774,845
SANOFLAVENTIS	BREAST CANCER - GENERAL		11,050	5,000		16,050
	CANCER PREVENTION & EARLY DETECTION					3,000
	GEOGRAPHIC		1,080,467	31,196		1,114,663
	HOPE LODGE		128,600	201,000		29,000
	OTHER PROGRAM RESTRICTIONS			500		500
	PATIENT NAVIGATION PROGRAMS		5,000	8,700		150,000
	PATIENT SERVICES		24,075	10,750		8,450
	UNRESTRICTED DONATIONS		1,238,142	377,896		40,500
SANOFLAVENTIS Total				74,000		231,450
SCHERING PLOUGH	BREAST CANCER - GENERAL			420		125
	GEOGRAPHIC		10,524	8,711		7,450
	HOPE LODGE		3,000	1,000		12,500
	OTHER PROGRAM RESTRICTIONS			1,000		1,000
	PATIENT SERVICES		700	700		700
	SCIENTIFIC RESEARCH					122
	UNRESTRICTED DONATIONS		52,130	34,572		10,921
SCHERING PLOUGH Total			66,354	45,982		31,818
SIGNAL PHARMACEUTICAL	BREAST CANCER - GENERAL		5,000	2,000		10,000
	UNRESTRICTED DONATIONS		26,000	18,000		74,000
SIGNAL PHARMACEUTICAL Total			31,000	20,000		20,000
SOUTHERN HEALTH SERVICES	UNRESTRICTED DONATIONS		5,000	5,800		5,400
STATE FARM	BREAST CANCER - GENERAL		75	225		50
	CAMPS FOR CHILDREN WITH CANCER			500		500
	OTHER PROGRAM RESTRICTIONS		500			500
	PATIENT NAVIGATION PROGRAMS			500		500
	PATIENT SERVICES		500			500

COMPANY NAME	DONATION RESTRICTION	Gift Calendar Year				Grand Total
		2006	2007	2008	2009	
	SCIENTIFIC RESEARCH	72,303	87,271	500	131,813	500
STATE FARM Total	UNRESTRICTED DONATIONS	73,587	88,348	87,707	132,363	377,869
	BREAST CANCER - GENERAL	11,204	6,181	6,615	5,000	29,010
STRYKER	UNRESTRICTED DONATIONS	1,960	4,700	5,330	1,570	13,560
STRYKER Total		13,164	10,881	11,945	6,570	42,570
	BREAST CANCER - GENERAL	100	280	50	625	1,055
TAKEDA PHARMACEUTICAL COMPANY LIMITED	CAMPS FOR CHILDREN WITH CANCER		5,000			5,000
	PATIENT NAVIGATION PROGRAMS	700	10,000	5,000	2,500	17,500
	PATIENT SERVICES			700	5,700	7,100
	SCIENTIFIC RESEARCH			25,000		25,000
	UNRESTRICTED DONATIONS	4,065	21,355	6,227	45,653	77,300
TAKEDA PHARMACEUTICAL COMPANY LIMITED Total		4,865	36,635	36,977	54,478	132,955
	BREAST CANCER - GENERAL	4,000	868	303		5,171
TAP PHARMACEUTICALS	OTHER PROGRAM RESTRICTIONS		500			500
	PATIENT NAVIGATION PROGRAMS			3,000		3,000
	PATIENT SERVICES		1,250			1,250
	UNRESTRICTED DONATIONS	53,585	35,501	45,473	86	134,645
TAP PHARMACEUTICALS Total		57,585	38,119	48,775	86	144,565
	BREAST CANCER - GENERAL	1,000			11,071	11,071
TEVA PHARMACEUTICALS USA	UNRESTRICTED DONATIONS	1,000	675	525	15,927	18,127
TEVA PHARMACEUTICALS USA Total		1,000	675	525	26,998	29,198
	BREAST CANCER - GENERAL	1,137	1,755	1,687	750	5,329
THE CHUBB CORPORATION	CAMPS FOR CHILDREN WITH CANCER		250			250
	HOPE LODGE			1,500		1,500
	UNRESTRICTED DONATIONS	53,155	65,481	28,499	24,180	169,315
THE CHUBB CORPORATION Total		54,292	67,486	29,686	24,930	176,394
	HOPE LODGE			10,000		10,000
HERMO FISHER SCIENTIFIC	SCIENTIFIC RESEARCH			30,000		30,000
	UNRESTRICTED DONATIONS		3,824	1,150	3,100	8,074
HERMO FISHER SCIENTIFIC Total			3,824	41,150	13,100	56,074
	BREAST CANCER - GENERAL	1,100	1,202	2,750	2,265	7,337
TRAVELERS FOUNDATION	UNRESTRICTED DONATIONS	16,335	14,528	18,971	8,098	57,931
TRAVELERS FOUNDATION Total		17,435	15,730	21,721	10,383	65,268
	BREAST CANCER - GENERAL			7,500	11,250	18,750
UNITED HEALTHCARE SERVICES	GEOGRAPHIC				5,000	5,000
	UNRESTRICTED DONATIONS	18,814	60,281	72,100	58,300	210,495
UNITED HEALTHCARE SERVICES Total		18,814	60,281	79,600	75,550	234,245
	BREAST CANCER - GENERAL	5,548	13,111	4,513	2,920	26,093
WELLPOINT	GEOGRAPHIC			10,000		10,000
	HOPE LODGE		113			113
	OTHER PROGRAM RESTRICTIONS	84	292			376
	PATIENT NAVIGATION PROGRAMS			75,000		75,000
	SCIENTIFIC RESEARCH	30	104	80	11	225
	UNRESTRICTED DONATIONS	75,732	74,253	91,819	82,569	324,373
WELLPOINT Total		81,396	87,873	181,412	85,500	436,179
	BREAST CANCER - GENERAL				1,048	1,048
WELLPOINT FOUNDATION	PATIENT NAVIGATION PROGRAMS			375,000		375,000
	PATIENT SERVICES			75,000		75,000
	UNRESTRICTED DONATIONS			500	5,094	5,594
WELLPOINT FOUNDATION Total				450,500	6,143	456,643

COMPANY NAME	DONATION RESTRICTION	Gift Calendar Year				Grand Total
		2006	2007	2008	2009	
WELLS FARGO	BREAST CANCER - GENERAL	11,733	10,640	13,872	35,574	71,819
	CAMPS FOR CHILDREN WITH CANCER		400	1,000		1,400
	CANCER PREVENTION & EARLY DETECTION	55,000				55,000
	GEOGRAPHIC	7,500	12,500	8,000	10,000	38,000
	HOPE LODGE	15,150		50	12,000	27,200
	OTHER PROGRAM RESTRICTIONS	5,000	12,000	5,000	5,000	27,000
	PATIENT SERVICES		25,000		25,000	50,000
	SCIENTIFIC RESEARCH		300	100		400
	YOUTH CANCER SURVIVOR SCHOLARSHIPS	10,000	1,500			11,500
	UNRESTRICTED DONATIONS	949,200	632,167	518,929	496,966	2,597,263
WELLS FARGO Total	1,053,583	669,507	571,952	584,540	2,879,582	
WELLS FARGO FOUNDATION			100	31,825	31,925	
WEST PHARMACEUTICAL SERVICES	BREAST CANCER - GENERAL			2,533		2,533
	HOPE LODGE	122,557	51,566	1,000		175,143
	UNRESTRICTED DONATIONS	4,770	7,900	475		13,145
WEST PHARMACEUTICAL SERVICES Total	127,327	59,466	4,008		190,821	
WYETH	GEOGRAPHIC		10,000		2,000	12,000
	HOPE LODGE		10,000			10,000
	PATIENT SERVICES		700	700	700	2,100
	UNRESTRICTED DONATIONS	15,625	12,735	13,248	18,045	59,653
WYETH Total	15,625	33,435	13,948	20,745	83,753	
Grand Total	2,110,191	1,148,196	15,369,039	10,334,335	58,227,266	

Exhibit B

**SOCIETY HOTLINE
1-800-539-7202**

AMERICAN CANCER SOCIETY, INC. AND ITS AFFILIATED ENTITIES

**CODE OF ETHICS
AND
CONFLICT OF INTEREST POLICY**

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CODE OF ETHICS AND CONFLICT OF INTEREST POLICY AMERICAN CANCER SOCIETY, INC. AND ITS AFFILIATED ENTITIES

Introduction and Applicability

The Code of Ethics and Conflict of Interest Policy (the “Code”) of the American Cancer Society, Inc. and its affiliated entities (collectively, the “Society”) establishes the ethical standards for volunteers and staff of the Society (collectively referred to as “associates”) in connection with Society business. The purposes of the Code are to provide evidence of the Society’s commitment to the lawful and ethical conduct of its business, to promote lawful and ethical behavior by its associates, and to protect those who report violations of the Code consistent with the Society’s Whistleblower Policy.

Conflicts of interest will arise in the normal course of conducting Society business. The Code is not designed to prohibit conflicts of interest but to protect the Society’s interest when it is contemplating entering into a transaction or arrangement that might benefit the private interests of an associate or might result in a possible excess benefit transaction. The Code is intended to supplement but not replace any applicable state or federal laws governing ethical conduct or conflicts of interest applicable to nonprofit and charitable organizations.

The Code applies to all staff and to all volunteers responsible for governance at any Society affiliated entity and those volunteers who have any fiduciary obligations in discharging their duties on behalf of the Society, including but not limited to, members of the National Assembly, the Boards of Directors and their committees. It is every associate’s responsibility to discharge his or her duties in a manner that promotes and preserves public trust, proper stewardship, and confidence in the integrity of the Society. Associates must respect and comply with Society rules and regulations, observe high standards of conduct, and participate in establishing and maintaining such high standards. **Adverse consequences, including employee termination or removal of a volunteer from his or her position, can result from failure to comply with the Code.**

It is the duty of all associates to review and assess their conduct in light of the provisions of the Code. Each associate shall seek, either in writing or in person, the advice of his or her supervisor or Society Counsel when a reasonable doubt regarding an ethical or legal consideration arises.

The Conflict of Interest Disclosure Statement (EXHIBIT A) must be completed by all staff and volunteers on an annual basis. The determination of which volunteers must complete the form is made by Society Counsel.

I. Policies Governing Ethical Conduct

- A. Society associates will perform their duties properly, diligently, and in an appropriately courteous manner.
- B. Consistent with the provisions of any applicable document retention policy, no associate shall falsify, destroy, mutilate, conceal, or fail to make required entries on any record within the associate's control, including the destruction of documents that are the subject of an investigation or a civil or criminal action to which the Society is a party.
- C. Associates with reporting responsibilities shall provide full, fair, accurate, timely, and understandable disclosure in all reports.
- D. Associates shall act honestly and ethically.
- E. No associate shall discriminate on the basis of race, color, religious creed, gender, national origin, age, physical ability, sexual orientation, marital status, or veteran status in the conduct of services for the Society.
- F. Associates who are attorneys, medical clinicians, certified public accountants, or members of other professional groups are bound by the appropriate professional duties and code of conduct of those roles.
- G. Associates shall comply with all state, federal and local laws, statutes and ordinances.
- H. Associates shall comply with all policies on confidentiality and privacy of information. Associates shall not use confidential or proprietary information for personal financial gain.

II. Duty of Loyalty to the Society – Avoiding Abuses of Position and Conflicts of Interest

The Society is a nonprofit, tax-exempt organization. Maintenance of its tax-exempt status is critical both for its continued financial stability and for public support. The Society is subject to scrutiny by, and is held accountable to, governmental and regulatory authorities as well as the public.

Consequently, there exists between the Society and its associates a fiduciary duty which carries with it a duty of loyalty. Associates have the responsibility of administering the affairs of the Society honestly and prudently and of exercising their best care, skill, and judgment for the sole benefit of the Society. Moreover, because of the Society's status as a public charity, every associate has an affirmative duty to act as a steward of the funds entrusted to the Society by its contributors.

Associates shall use the resources, property, and funds under the associate's control judiciously and in the best interest of the Society. Associates shall exercise good faith in all transactions, and they shall not use their positions with the Society or knowledge gained therein for their personal benefit or for the benefit of any other person or organization. The interests of the Society must be the first priority in all decisions and actions.

No associate shall accept, solicit, or agree to accept any gift, favor, complimentary service, or other thing of value under circumstances from which it might be reasonably inferred that such gift, service, or other thing of value was given or offered for the purpose of influencing the associate in the discharge of his or her duties. Vendor selections and purchasing decisions must always be business decisions based on merit: by comparing and evaluating price, quality, performance, and suitability. Decisions must not be influenced by any other factor, such as personal relationships, gifts or hospitality.

A. Areas in Which Conflicts May Arise – A conflict of interest may arise in the relations of associates with any of the following third parties:

- Persons and firms supplying or *potentially* supplying goods and services to the Society (vendors and professionals), including, but not limited to:
 - Construction services.
 - Professional services, including accounting and legal services.
 - Contracts with individuals, including consultants and part time staff.
 - Contracts with *companies* providing non-professional services, such as marketing, research services, information technology, consulting or other services, etc.
 - Persons and firms from whom the Society purchases or leases property and equipment.
 - Persons and firms with whom the Society is dealing or planning to deal in connection with the purchase or sale of real estate, securities, or other property.
- Persons or parties with a direct, material, Financial Interest in the outcome of Society programs, policies or positions.
- Customers of Society services (e.g. Quitline/Employer Initiative customers).
- Donors, volunteers, and other supporters of the Society.
- Agencies, other nonprofits, and associations that affect the operations of the Society.
- Entities from whom the Society receives grants or to whom the Society provides grants.
- Tobacco Companies and their related entities.

B. Nature of Conflicting Interest - A conflicting interest may be defined as an interest, direct or indirect, with any persons or firms listed in Section A. Such an interest might arise through:

- An association with any entity that deals with the Society of which an associate or an immediate family member is a partner or a controlling shareholder, executive officer, or has any other position with another entity that would reasonably cause the appearance of a conflict of interest. Any question regarding independence should be reviewed by Society Counsel or, where appropriate, the Audit Committee for final resolution.
- Receiving compensation for services with respect to individual transactions involving the Society.
- Using Society time, personnel, equipment, supplies, or goodwill for any purpose other than Society-approved activities, programs, or purposes.

- Receiving allowances from the Society (other than incidental amounts incurred while traveling with any excess promptly repaid in full) if you are a director, volunteer, or officer of the Society.
- Receiving any gift, courtesy or loan from third parties dealing or competing with the Society, or seeking to deal with the Society, except for gifts with a value of less than seventy-five dollars (\$75) that could not be refused without discourtesy and which will not give rise to the perception that the associate's independent judgment might be compromised. Nominal gifts such as pens; caps; paperweights; t-shirts; coffee mugs; soft drinks; flowers; chocolates or other small tokens may be accepted. No personal gift of cash or a cash equivalent (i.e. gift cards, gift checks, vouchers, phone cards, checks or money orders, etc.); special discount; tickets for entertainment where the host will not be present; gifts that would embarrass the Society; or situations where the Society's commitment to diversity and respect for others could be violated or could cause unease, such as adult entertainment, shall ever be accepted from a vendor during a bidding or contracting process. Associates shall never request gifts or hospitality of any sort. Associates shall avoid a pattern of accepting frequent courtesies from the same person or company.

C. Conflict of Interest Disclosure Procedures:

The areas of conflicting interest listed in Section A, and the relationships in those areas that may give rise to conflicts, as listed in Sections B, are not exhaustive. Conflicts may arise in other areas or through other relationships. The Code does not prohibit conflict of interest transactions but instead provides a framework for conflict avoidance and management. However, if an associate believes that he or she is in a possible conflict situation, he or she should assume that a conflict does exist and act accordingly.

The fact that one of the interests described in Section A or B exists does not necessarily mean that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material, that upon full disclosure of all relevant facts and circumstances, it is necessarily adverse to the interests of the Society. However, it is the policy of the Society that the existence of any of the interests described in Section B must be disclosed before any transaction is consummated. Moreover, all disclosed conflicts shall be addressed in accordance with the procedures set forth below.

It shall be the continuing responsibility of associates to scrutinize their transactions and outside business interests and relationships for potential conflicts and to immediately make any necessary disclosures. In deciding whether a transaction might constitute a conflict of interest, an associate should ask these questions:

- Is the transaction included as a scenario in the Frequently Asked Questions attached to the Code?
- Would the transaction be prudent, be in good faith, and be in the best interests of the Society?
- Would the transaction affect any decision I will make for the Society?

- How would the transaction look to someone outside of the Society, such as a donor, a public watchdog group, the state attorney general, the news media or a Congressional Committee?
- How would the transaction seem to others within the Society? Would they think it might affect how I do my job for the Society?

1. Annual Statements

Each associate shall annually sign a Conflict of Interest Disclosure Statement, which describes any existing or potential conflict of interest and affirms that such person:

- a. Has received a copy of the Code;
- b. Has read and understands the Code; and
- c. Has agreed to comply with the Code.

Annual Conflict of Interest Disclosure Statements shall be filed on or before January 31st in the case of employees and on or before the date of the first meeting of the board in each calendar year in the case of governance volunteers.

2. Continuing Disclosure

In connection with any actual or potential conflict of interest, an associate must disclose the existence of the Financial Interest as defined in Part V on a Conflict of Interest Disclosure Statement. If the associate is a disqualified person, he or she must disclose all material facts to the directors and members of the committees with governing board delegated powers prior to engaging in the proposed transaction or arrangement.

The receipt of an offer of any gift(s) exceeding the value of \$75 must be reported immediately to your supervisor (if staff). Similarly, a series of gifts within a one-year time frame, all of which cumulatively are valued at seventy-five dollars (\$75) or more should be treated as a single gift for purposes of this policy. Volunteers receiving offers of gifts in excess of \$75 must notify Society Counsel or, in the case of a Division without Society Counsel, the Chief Financial Officer (CFO). In each instance, a Conflict of Interest Disclosure Statement should be filed with Society Counsel, or the CFO where appropriate. Society Counsel (or CFO where appropriate) will review the circumstances to determine if the potential gift can be accepted or determine if a potential conflict of interest exists and communicate its decision to the supervisor (in the case of staff) or the Audit Committee (in the case of volunteers). No gift in excess of the value of \$75 may be accepted without the prior approval of the supervisor (if staff) and Society Counsel or CFO where appropriate (for both staff and volunteers).

In international situations where turning down a gift with more than a \$75 value would be culturally discourteous, the gift may be accepted on behalf of the Society but must be immediately reported to the National Home Office, Office of Corporation Counsel.

3. Procedures for Addressing the Conflict of Interest

In general, once a conflict of interest transaction is identified, the associate with the conflict shall not attempt to influence other decision makers regarding the matter, and shall not participate in any discussion of the transaction except to respond to information requests. In addition, if the associate is in a position to vote on, or otherwise participate in the decision with respect to, the conflict of interest transaction, he or she shall abstain from any such vote or participation. It shall be the responsibility of the decision-making authority or body to properly record in the minutes of any discussion regarding a conflict of interest transaction the name of the person who discloses the conflict of interest, the nature of the conflict of interest, and documentation of the comparability data (i.e. industry surveys, compensation studies, competitive bids, etc.), if any, used in determining whether the Society should enter into the transaction.

In the case of a transaction involving a disqualified person:

- a. The disqualified person may respond to questions at the governing board or committee meeting, but after answering any questions, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
- b. The chairperson of the governing board or committee shall, if appropriate, appoint a disinterested person or committee of disinterested persons to investigate alternatives to the proposed transaction or arrangement.
- c. After exercising due diligence, the governing board or committee shall determine whether the Society can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- d. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the governing board or committee shall determine by a majority vote of the disinterested persons whether the transaction or arrangement is in the Society's best interest, and whether it is fair and reasonable. It shall then make its decision as to whether to enter into the transaction or arrangement and record the decision, together with the supporting analysis, in the minutes of the proceeding.

In the case of a transaction involving a non-disqualified person, Society Counsel or, in the case of a Division without Society Counsel, the CFO, shall review the circumstances surrounding the transaction, including any comparability data, and determine whether the transaction requires further review and approval by the Audit Committee. Society Counsel, or in the case of a Division without staff counsel, the CFO, shall maintain a record of all disclosed or discovered conflict of interest transactions and report quarterly to the Audit Committee the actions taken with respect to each.

D. Violations of the Conflicts of Interest Policy

If Society Counsel (or CFO where appropriate), or in the case of a volunteer, the governing board or committee, has reasonable cause to believe an associate has failed to disclose actual or possible conflicts of interest, it shall inform the associate of the basis for such belief and afford the associate an opportunity to explain the alleged failure to disclose.

If, after reviewing the associate's response and after making further investigation as warranted by the circumstances, Society Counsel (or CFO where appropriate), or the governing board or committee determines the associate has failed to disclose an actual or possible conflict of interest, it shall initiate appropriate disciplinary and corrective action.

III. Confidential Information

Associates shall not violate Society privacy and confidentiality policies. In addition, associates shall not use confidential or proprietary information for personal financial gain.

IV. Reporting Conflicts and Violations - Duties, Protections and Corrective Actions

A. Each associate shall immediately report conflicts and violations of the Code, criminal law, or the attempt to induce another to violate these standards or violate criminal law, in accordance with established policies. A failure to report a violation is itself a violation of the Code. If anonymity is requested, the Society will not disclose the identity of the reporting individual except as needed to properly investigate the allegation, or unless legally required to do so.

The Society's Whistleblower Protection Policy (attached hereto as EXHIBIT B and incorporated herein by reference) establishes the protections against retaliatory actions for any reports of Code violations. Moreover, the Society's independent hotline at **1-800-539-7202** is a confidential resource dedicated solely to answering questions and concerns or reporting questionable activity related to financial internal controls, audit, prevention of illegal activity, accounting issues, and related matters. Associates may ensure complete anonymity when reporting a concern by simply not giving their names. More information on the hotline is available at www.societylink.org (the Intranet) under Risk Management.

B. An associate found to be in violation of the Code shall be subject to corrective actions taken by the appropriate level manager (or Board for board members and other volunteers). Such action may include further training and instruction regarding the provisions of the Code, necessary steps to remediate any harm to the Society, fellow associates, or others, and disciplinary actions up to and including termination. Each violation will be assessed on an individual case by case basis and the corrective action tailored to the specifics of that violation. When deciding what action is necessary, consideration will be given to the flagrancy of the violation, the harm caused, whether the violation was intentional or unintentional, whether the associate voluntarily disclosed the violation, prior misconduct, the likelihood of future misconduct, the general circumstances surrounding the violation, and other considerations as appropriate.

C. When an associate completes the annual conflict of interest disclosure statement, the associate must disclose all of the items on the questionnaire for the past calendar year. Any intentional failure to disclose required information or the provision of information that is inaccurate or false in nature is a violation of the Code. In addition, there is a continuing duty to disclose any conflict of interest that arises during the course of the year.

V. Definitions

1. Disqualified Person:

A “disqualified person” is any person who is, or has been during a period beginning five (5) years from the date of a transaction between the Society and such person, in a position to exercise substantial influence over the affairs or finances of the Society. It is not necessary that the person actually exercise substantial influence, only that the person be in a position to do so.

Certain insiders, by definition, are disqualified persons, including the members of the National Home Office Executive Cabinet and Chief Financial Officer, Division CEO’s, CFO’s and COO’s, and the voting members of the Boards of Directors, regardless of their compensation.

Certain family members of a disqualified person and entities controlled by a disqualified person are also disqualified persons. For this purpose, the term control is defined as owning more than 35% of the voting power of a corporation, more than 35% of the profits interest in a partnership, or more than 35% of the beneficial interest in a trust.

2. Financial Interest:

A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- a. An ownership or investment interest in any entity with which the Society has a transaction or arrangement;
- b. A compensation arrangement with the Society or with any entity or individual with which the Society has a transaction or arrangement; or
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Society is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not nominal in value. Compensation does not include the reimbursement of reasonable expenses incurred in connection with the performance of Society duties.

A Financial Interest is not necessarily a conflict of interest. A person who has a Financial Interest may have a conflict of interest if the appropriate reviewing body determines that a conflict of interest exists.

3. Society Counsel:

With respect to the National Home Office, Society Counsel shall mean the Chief Counsel.

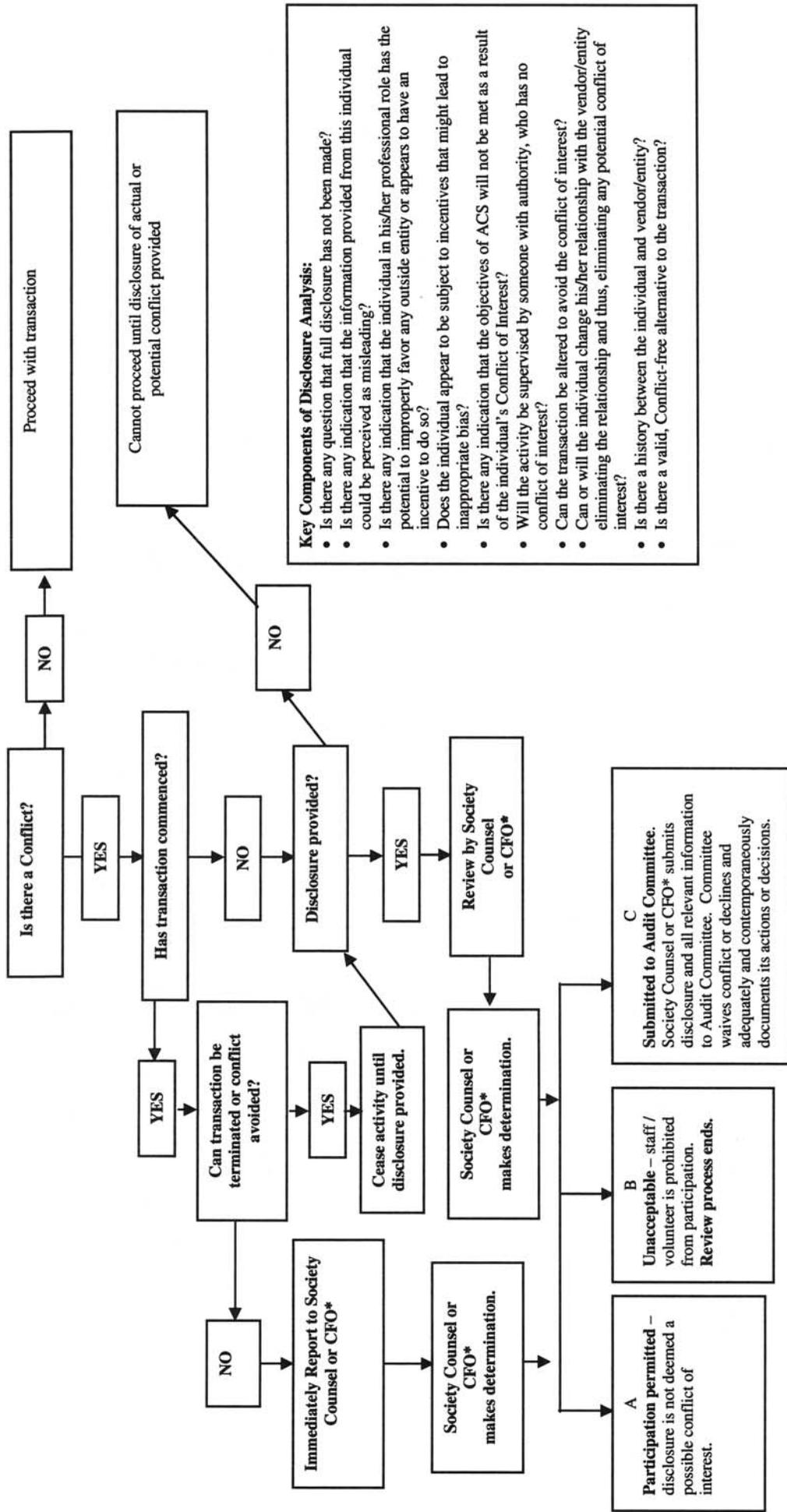
In the case of affiliates with staff attorneys, Society Counsel shall mean such in-house counsel. For affiliates without staff attorneys, Society Counsel shall mean the outside Counsel engaged by the affiliates to perform legal services in matters relating to the Code of Ethics.

4. Tobacco Company:

“Tobacco Company” means any company that manufactures tobacco products and is commonly considered to be part of the tobacco industry, including subsidiaries and parent companies, and companies under common control with such company, as well as philanthropic foundations and other organizations closely linked with the tobacco industry.



CONFLICT OF INTEREST REVIEW PROCESS (NON DISQUALIFIED PERSONS)



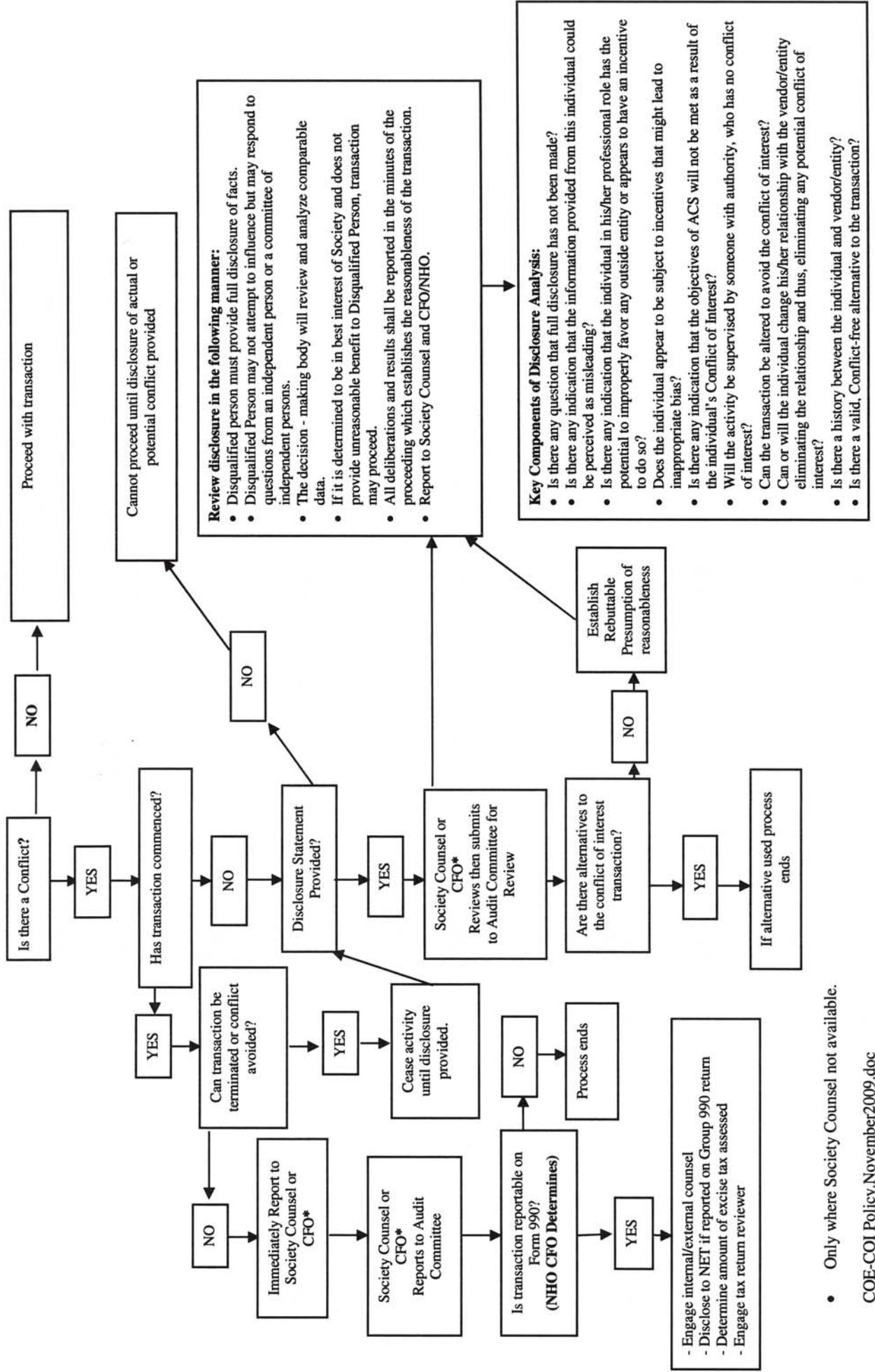
Key Components of Disclosure Analysis:

- Is there any question that full disclosure has not been made?
- Is there any indication that the information provided from this individual could be perceived as misleading?
- Is there any indication that the individual in his/her professional role has the potential to improperly favor any outside entity or appears to have an incentive to do so?
- Does the individual appear to be subject to incentives that might lead to inappropriate bias?
- Is there any indication that the objectives of ACS will not be met as a result of the individual's Conflict of Interest?
- Will the activity be supervised by someone with authority, who has no conflict of interest?
- Can the transaction be altered to avoid the conflict of interest?
- Can or will the individual change his/her relationship with the vendor/entity eliminating the relationship and thus, eliminating any potential conflict of interest?
- Is there a history between the individual and vendor/entity?
- Is there a valid, Conflict-free alternative to the transaction?

* Only where Society Counsel not available.



CONFLICTS OF INTEREST REVIEW PROCESS (DISQUALIFIED PERSONS)



• Only where Society Counsel not available.

National Assembly Meeting November 2008

EXHIBIT A
American Cancer Society, Inc.

CONFLICT OF INTEREST DISCLOSURE STATEMENT
(FILED ANNUALLY AND WHEN A CONFLICT OF INTEREST ARISES)

In order to be comprehensive, this statement of disclosure/questionnaire requires you to provide information with respect to certain parties that are related to you. These persons are termed “affiliated persons” and include the following:

- a. your spouse, domestic partner, parents, grandparents, great-grandparents, siblings, children, grandchildren, great-grandchildren, and spouses of parents, grandparents, siblings, children, grandchildren and great-grandchildren or anyone residing with you.
- b. any entity that deals with the Society of which:
 - you are a partner or a controlling shareholder or executive officer; or
 - you have any other position, financial or otherwise, that would cause the appearance of a conflict of interest.
- c. any trust, estate, or other legal entity in which you have a substantial beneficial interest or as to which you serve as a trustee or in a similar capacity.

Any question regarding your affiliation with a person should be reviewed by Society Counsel and the Audit Committee for final resolution.

1. YOUR NAME (Please print)

2. YOUR SOCIETY POSITION:

_____ ACS CAN Board Member

_____ Board of Directors Member

_____ Board of Directors Officer

_____ National Assembly Member

_____ Other Volunteer Role: Describe Role _____

_____ Staff (position): _____

3. Have you or any of your affiliated persons been employed by or provided services or property to the Society in the past year other than in your capacity shown in question 2 above and other than services or property you donated? _____ YES _____ NO

If yes, please describe the nature and value of the services or property, and if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

4. Have you or any of your affiliated persons purchased services or property from the Society in the past year other than services or property generally available for purchase by others (i.e. the purchase of Relay and other Society branded items, postage, equipment generally offered for sale to all staff and volunteers, etc.)? ____YES ____NO

If yes, please describe the purchased services or property and the value and, if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

5. Have you or any of your affiliated persons had any direct or indirect interest in any business transaction(s) or other business relationship in the past year to which the Society or any volunteer officer or staff officer of the Society or its affiliates was or is a party? ____YES ____NO

If yes, describe the transaction(s) or relationship and value, and if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

6. If you are a director, staff officer, or volunteer officer, were you or any of your affiliated persons financially indebted to the Society at any time in the past year (other than minor amounts incurred in the ordinary course of business and promptly repaid in full)? ____YES ____NO

If yes, please describe the reason for the indebtedness and the amount, and if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

7. In the past year, did you or any of your affiliated persons receive, or become entitled to receive, directly or indirectly, any personal benefits from the Society as a result of your relationship with the Society that in the aggregate could be valued in excess of \$1,000, that were not or will not be compensation directly related to your duties to the Society? ____YES ____NO

If yes, please describe the benefit(s) and value, and, if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

8. Are you or any of your affiliated persons a party to, or have an interest in, any pending legal proceedings involving the Society? ____ YES ____ NO

If yes, please describe the proceeding(s) and magnitude of potential claims or settlements if any, and, if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

9. Are you aware of any other events, transactions, arrangements, or other situations that have occurred or may occur in the future that you believe should be examined by the Society in accordance with the terms and intent of the Society's Code of Ethics and Conflict of Interest Policy? ____ YES ____ NO

If yes, please describe the situation(s), and, if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

10. Have you received any gift or loan from a third party dealing or competing with the Society, or seeking to deal with the Society, that exceeded the value of seventy-five dollars (\$75) and that was not returned to the giver? ____ YES ____ NO

If yes, please describe the situation(s), and all of the facts and circumstances and amounts involved.

11. Have you or any of your affiliated persons been employed by or provided services to a Tobacco Company in the past year? ____ YES ____ NO

If yes, please describe the nature of the employment or services activity, and if an affiliated person is involved, the identity of the affiliated person and your relationship with that person:

12. Have you:

- Been convicted of a felony involving a transaction in securities, consumer fraud or antitrust in any state or federal jurisdiction within the seven year period immediately preceding the execution of this Statement?
____ YES ____ NO

- Been convicted of a felony, the essential elements of which consisted of fraud misrepresentation, theft by false pretenses, or restraint of trade or monopoly in any state or federal jurisdiction within the seven year period immediately preceding the execution of this Statement?
____ YES ____ NO

- Been or are subject to an injunction, judgment, decree or permanent order of any state or federal court entered within the seven-year period immediately preceding the execution of this Statement wherein such injunction, judgment, decree or permanent order:

- involved the violation of fraud or registration provisions of the securities laws of that jurisdiction; or
- involved the violation of the consumer fraud laws of that jurisdiction; or
- involved the violation of the antitrust or restraint of trade laws of that jurisdiction?

____ YES ____ NO

If yes, please provide the following information:

- a. Full name and prior name(s) used. _____
- b. Full birth name _____
- c. Present home address _____
- d. Prior addresses (for immediate preceding 7-year period)

- e. Date and location of birth _____
- f. The nature and description of each conviction or judicial action, date and location, the court and public agency involved and file or case number.

13. Have you served in any such capacity in any other corporation in any jurisdiction on the bankruptcy or receivership of the other corporation? ____ YES ____ NO

If yes, please provide the following information for each corporation:

- a. Name and address of the corporation. _____
- b. Full name, including alias and address of each person involved.

- c. State(s) in which the corporation:
 - was incorporated. _____
 - has transacted business. _____
- d. Dates _____ of _____ corporate _____ operation.

- e. A description of the bankruptcy or receivership, including the date, court or agency and the file or case number.

I HERBY CONFIRM that my responses to the above questions are complete and correct to the best of my information and belief.

I HERBY CONFIRM that I have read and understand the Society's Code of Ethics and Conflict of Interest Policy and that my responses to the above questions are complete and correct to the best of my information and belief.

I agree that if I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with the Code of Ethics and Conflict of Interest Policy, I will immediately notify the Society Counsel.

Signature Date

Please return to:
Sherrhonda Roach
Office of Corporation Counsel
American Cancer Society, Inc
250 Williams Street
Atlanta, Georgia 30303
Fax: 404-417-5808

EXHIBIT B

Whistleblower Protection Policy: Reporting Suspected Violations of Law or Misconduct

The American Cancer Society, Inc. and its affiliated entities (“the Society”) are committed to maintaining a workplace where associates are free to raise good faith concerns regarding the Society's business practices, specifically: (1) reporting suspected violations of law on the part of the Society, including but not limited to federal laws and regulations; (2) providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body; and (3) identifying potential violations of the Society's Code of Ethics.

The Society policy forbids any retaliatory action, including harassment, intimidation, or adverse employment actions of any kind, to be taken against an individual who, in good faith, reports a suspected violation of law or the Code of Ethics, or who in good faith complains about, or raises a claim or concern about, any type of harassment, retaliation or discrimination prohibited by applicable law or Society policy. Retaliation is also prohibited against individuals who are not themselves complainants, but who participate in good faith in an investigation. Any associate who engages in any form of retaliation will be subject to discipline, up to and including employee termination or removal of volunteer from his or her position. Individuals who believe that they or someone they know are being, or have been, retaliated against should immediately report this to his or her appropriate supervisor, Society Counsel, the appropriate talent management/human resource representative, or anonymously by calling the Hotline at 1-800-539-7202. The Hotline is created for this purpose and is managed and staffed by an outside company in order to maintain the anonymity of the source.

**Frequently Asked Questions
Regarding Potential Ethical Dilemmas**

The purpose of this section is to provide associates (volunteers and staff) with a non-exhaustive list of potential ethical dilemmas that may arise and how the Code of Ethics and Conflicts of Interest Policy would serve to guide their actions and behavior. If any associate is ever unsure as to what is appropriate legal or ethical behavior, the associate should consult with his or her supervisor. Also, Society Counsel is always available to answer any questions regarding ethical considerations.

Some Possible Scenarios

Duty to Report

Question – I work for the Society and one of the reasons I chose to work here is that it feels good to be a part of an organization that does something important and positive for society. The other day I saw one of my colleagues doing something that I am pretty sure is a violation of the Code of Ethics. I do not want to get anyone in trouble. What should I do?

Answer – No one likes the feeling of reporting the wrong conduct of another. At the same time, the work environment that we all enjoy is a result of respectful behavior. When it seems clear that another associate is doing something unethical, then each of us has an obligation to report that behavior to an appropriate supervisor and/or to Society Counsel. In the event the unethical conduct is financially related as described in Section IV of the Code, you may report it by way of the toll free anonymous Confidential Hotline at **1-800-539-7202**.

Gifts and Hospitality

Question – I work with our vendors as part of my job and from time to time they will offer to take me out to lunch or some other social outing. Is it permissible for me to accept these gifts?

Answer – The Code of Ethics and Conflicts of Interest Policy has specific provisions about accepting gifts. As a general rule, we should decline even small gifts where it is not going to be perceived as impolite or cause us to harm a vendor relationship. It is easy to use this Code as an excuse why you are unable to accept a vendor's generosity. Under no circumstances should you accept a gift worth \$75 or more without the prior approval of your supervisor and Society Counsel.

Question – A vendor asks me to accompany him to a baseball game at which we plan to discuss business. May I go?

Answer – Yes, as long as the ticket has a face value of less than \$75 and the outings are infrequent (one per year).

Question – Occasionally, a vendor will call and offer to give me tickets to a sports event or a concert. The face value of the tickets is less than \$75. May I accept this gift?

Answer – No. The gift does not serve an ACS business purpose.

Question – May I purchase sporting or concert tickets from a vendor?

Answer – Yes, as long as the event is not “Sold Out”. Under those circumstances you would be accepting a gift of an opportunity to buy tickets that are not generally available for purchase and that is inappropriate.

Question –Is our department allowed to keep flowers, chocolates, or other small treats sent from a vendor?

Answer – Generally it is appropriate to accept such occasional, infrequent, nominal gifts, but they should be shared with your co-workers.

Question – I have been invited by a vendor to go to a conference in another city about new issues facing technology departments. The vendor is offering to pay for my plane, hotel, meals, and to take me golfing once or twice while we are there for the weekend. My department was debating about whether to send me to the conference at ACS expense before this offer was extended. Should I accept this gift from the vendor?

Answer – This type of gift should be brought to the attention of both your supervisor and Society Counsel for review. If this is a conference that the Society was considering asking you to attend, it might be appropriate to accept that part of the gift from the vendor. If the gift is going to benefit the Society, then it is much like a donation since it saves the Society the expenses of your flight and hotel. At the same time, if you are involved in the review of purchases and potential purchases from this vendor, the offer to buy your meals and pay for your golfing (or other activities) are too close to creating a real conflict issue and should not be accepted. The review by Society Counsel and your supervisor will give you the guidance you need.

Question – A Society donor that I have been cultivating has died. I have found out that the donor left me \$10,000 in his will. What am I ethically bound to do with the money?

Answer – Ethically, you should either disclaim the gift or ask that the executor give the bequest to the Society. If state law does not grant the executor the power to give the bequest to another organization, you could accept the gift and make a donation to the Society in the exact amount of the gift.

Confidentiality and Privacy

Question – In my job with the Society, I sometimes come in contact with donor information. I am amazed sometimes at the people who donate money to the Society and how much they donate. Sometimes I can't help but share little tidbits with my friends. Is this a problem?

Answer – Yes, it is a big problem. We are all bound by the highest standards of confidentiality and as a condition of our employment we have agreed to protect the confidentiality of our constituent medical information and our donors' information, which is some of the most sensitive information we handle. If we are not careful and do not handle confidential information appropriately, we run the risk of losing future funding and seriously hurting our organization. What seems like a little bit of innocent gossip is a serious violation and should be avoided.

Question - In my job at ACS I have access to our screening guidelines before they are made public. I know that our new guidelines will be extremely beneficial for a particular company that manufactures a test included in the guidelines. I would like to buy shares of that company's stock now because I think once our guidelines are made public, the shares of that company's stock will increase. Is it permissible for me to make this trade?

Answer – No, under our Code of Ethics, it is not permissible for you to buy or sell shares of publicly traded stock based on confidential information. In addition, you may be subjecting yourself to prosecution by the Securities and Exchange Commission if you do so.

Question - I was part of a team that selected a vendor for a particularly large project for us. I would like to buy shares of the vendor's stock now because I think once it becomes public that the vendor is doing such a large project for us, the shares of the vendor's stock will increase significantly. Is it permissible for me to make this trade?

Answer – No, it is not permissible for you to buy or sell shares of publicly traded stock based on confidential information. In fact, you may be subjecting yourself to prosecution by the Securities and Exchange Commission if you do so.

Doing Business With Relatives

Question – A donor I have cultivated has died and left the Society their house. The Society has decided to sell the house. My spouse is a real estate agent. Can I recommend my spouse to the Society to conduct the sale of the house?

Answer – No. This is a situation where there is clearly the appearance of impropriety since your spouse (and indirectly you) would benefit monetarily from the sale of the property.

Question – What if my spouse is willing to act as the real estate agent for the sale of the property in return for the Society reimbursing the costs of the sale (e.g. listing fees, etc.)?

Answer – This would depend upon the particular situation and would need to be reviewed by Society Counsel.

Question – As a planned giving officer for the Society, I maintain a referral list of attorneys for potential donors. May I include my spouse on this list? What if my spouse will provide the legal services pro bono?

Answer – You may not refer potential donors to your spouse unless your spouse will provide the legal services pro bono. Otherwise, there is an appearance of impropriety since your spouse (and indirectly you) would benefit monetarily from the referral. Obviously since your spouse would be in this case representing the donor pro bono, the fact of the relationship would have to be disclosed to the donor, consistent with the ethical canons of the local jurisdiction.

Question – My brother owns a sign company. I was asked by the income development director to see if I could get them a good price on the signs for an event and the signs were purchased from my brother's sign company by ACS. Do I need to disclose the relationship?

Answer – Yes. If any of your affiliated persons provide services or property to ACS, the transaction must be disclosed. Purchase of services and property from any affiliated person should be approved by Society Counsel and senior management prior to entering into the purchase. If a transaction has occurred since the last Conflict of Interest Disclosure Statement, you should submit an updated Conflict of Interest Disclosure Statement to Society Counsel.

Frequently Asked Questions related to transactions that may lead to the imposition of “Intermediate Sanctions” by the IRS¹

Question – What are the Intermediate Sanctions rules and how do they apply to the Society?

Answer – “Intermediate Sanctions” are a form of excise tax (i.e., penalty) that the IRS assesses in the case of certain transactions, known as “excess benefit transactions,” between the Society and certain individuals (or their controlled entities), known as “disqualified persons.” Only the few influential persons within our organization are covered by these rules when they receive benefits, such as compensation, fringe benefits, or contract payments. The terms “excess benefit transaction” and “disqualified person” are defined in the Internal Revenue Code. For purposes of the Intermediate Sanctions rules, a “disqualified person” is defined generally as someone in a position to exert substantial influence over the affairs of an organization. This would include, for example, voting members of the governing body, and persons holding the positions of president, chief executive officer, chief operating officer, treasurer and chief financial officer, or positions of similar influence. A disqualified person also includes certain family members of a disqualified person and entities of which a disqualified person owns a 35% or greater interest.

An “excess benefit transaction” is a transaction in which an economic benefit is provided by the Society, directly or indirectly, to or for the use of a disqualified person, and the value of the economic benefit provided by the Society exceeds the value of the consideration received by the Society. To determine if an excess benefit transaction has occurred, the review of the transaction in question must take into account all consideration and benefits exchanged between or among a disqualified person and the Society and any of its affiliates. In the case of an excess benefit transaction, the general rule for the valuation of property, including the right to use property, is fair market value. For purposes of the Intermediate Sanctions rules, fair market value is defined as the price at which property, or the right to use property, would change hands between a willing buyer and a willing seller, neither being under any compulsion to engage in the transaction (generally referred to as an arms-length transaction).

Question - If I discover a potential violation of the Intermediate Sanctions rules, what should I do?

Answer – If you become aware of any potential violations of the Intermediate Sanctions rules in a transaction that involves the Society, you must contact the Office of Corporation Counsel. The Office of Corporation Counsel will be able to give you comprehensive advice on exactly what needs to be done to rectify the situation and how to protect yourself and the Society.

¹ Note that the vast majority of ACS employees and contractors are not affected by these rules.

Question - Is there a threshold or de minimis amount below which the Intermediate Sanctions rules do not apply? In other words, do we only really need to be concerned about very large transactions or dollar amounts?

Answer – There is no such threshold or de minimis amount with Intermediate Sanctions. Technically, even one dollar of excess compensation to a disqualified person is defined as an excess benefit transaction subject to the Intermediate Sanctions excise tax. While the IRS, upon audit, might choose to focus on larger transactions, as a matter of policy the Society and its associates should avoid violating these rules regardless of the amount involved.

Question - What is the statute of limitations for violations of the Intermediate Sanctions rules?

Answer – The general period in which the IRS could assess an Intermediate Sanctions excise tax would be three years from the date the transaction occurred. For purposes of the Intermediate Sanctions rules, an excess benefit transaction occurs on the date the disqualified person is deemed to receive the economic benefit from the Society under federal income tax principles. Certain exceptions to this general rule, including the failure to disclose the transaction on a timely filed return, could double the statute of limitations to six years or even eliminate the statute of limitations altogether. Any concerns regarding a potential excess benefit transaction should be discussed with one of the Society experts identified by the Office of Corporation Counsel. These experts can help you address all relevant questions including the statute of limitations applicable to your situation.

Question - Does the Society have a list of potential disqualified persons that I can refer to when approving contracts or other transactions that might become excess benefit transactions?

Answer – Because the ultimate determination of whether someone is a disqualified person depends on a factual analysis related to the degree of influence that person may exercise over the affairs of an organization, the Society can not maintain a comprehensive list of potential “disqualified persons”. You will need to make the necessary inquiries of parties involved in any potential “excess benefit transaction” to determine if any of them may meet the definition of a “disqualified person.”

Question - If I am involved in an Intermediate Sanctions violation and assessed an excise tax, does that become public information?

Answer –Yes, the IRS requires full disclosure on the Society’s annual Federal Form 990, Return of Organization Exempt from Income Tax, of the details of any excess benefit transactions which involve the Society. This includes listing the names of any disqualified persons involved in the transactions. The Federal Form 990 is a public

document available for inspection by anyone. The Society's Form 990 is regularly reviewed by the local media looking for potential stories and is available on the internet.

Question - A high level employee has chosen to purchase a valuable Society asset. The employee plans to complete the purchase using payroll deductions. Does this give rise to a potential excess benefit transaction under the Intermediate Sanctions rules?

Answer – The transaction could give rise to a potential excess benefit transaction if the employee is not charged interest because the transaction is tantamount to an interest free loan. To determine if disclosure and penalties apply, you will need to determine if the employee would be considered a disqualified person under the IRS definition. Some employees will meet the definition because of the office they hold (e.g. CEO or CFO). Others meet the definition based on facts and circumstances that establish their ability to exercise substantial influence over the operations and/or finances of the Society.

Question - A relative of a high level employee is receiving payments from the Society for consulting services. Does this qualify as a potential excess benefit transaction under the Intermediate Sanctions rules?

Answer – You will need to determine if the employee is a disqualified person. If the employee holds an office with the Society that makes the staff member an “automatic” disqualified individual, the payments must be reviewed for reasonableness and documentation to that effect retained for at least the extended (6 year) statute of limitations period. If the employee is not an "automatic" disqualified person, you need to contact the Office of Corporation Counsel for a facts and circumstances review.

Question – The Society is making payments to a relative of a member of the Board for consulting services. Does this qualify as a potential excess benefit transaction under the Intermediate Sanctions rules?

Answer – A voting member of the Board is an "automatic" disqualified person. So are certain family members of the Board member. If the payments are not reasonable, an excess benefit transaction exists. You should contact the Office of Corporation Counsel for a review of the facts and circumstances including appropriate Audit Committee review/approval and disclosure.

Exhibit C

AMERICAN CANCER SOCIETY Policy on Corporate Relationships

The American Cancer Society, the largest cancer-related nonprofit, recognizes the need for transparency, stewardship, and science-based decision making when entering mission-based and development relationships with corporations. For this reason, the American Cancer Society has adopted the National Health Council policy recommendations surrounding corporate relationships.

The policy is intended to provide clarity around types of corporate relationships that are unacceptable to ACS; requirements for disclosure of monetary support; and ongoing evaluation of corporate relationships.

Criteria for Corporate Relationships

All corporations are considered qualified for collaboration unless the corporation:

- Is the owner, manufacturer, or distributor of a product that when used as directed is a known or probable carcinogen (Groups 1 and 2A) as classified by the International Agency for Research on Cancer (IARC).
- Is a division, subsidiary, or partially owned by a tobacco or firearm company.
- Is insolvent.
- Is suffering from reputation or publicity issues.

Written Agreements

ACS will enter into a standard written agreement for all corporate gifts, sponsorships, and cause-related branding and/or marketing campaigns greater than \$25,000 in value. The written agreement will provide agreed upon terms related to publicity, logo, recognition strategy, indemnification, status of restricted or unrestricted, and description of mission-related activity that will be supported if applicable.

Disclosure

ACS will disclose all corporate relationships resulting in transfers greater than \$25,000. Disclosure will be within the corporate recognition section of cancer.org. Disclosure will be posted within 6 months of the close of the prior fiscal year (by March 1 of each year for prior FY). Total support will be grouped by \$50,000 increments above \$25,000.

Operations

All entities of the American Cancer Society will comply with these policies.

Evaluation

Corporate relationships will be evaluated on an annual basis with the intent to ensure impact is being made on mission and development activities.