GIFT ACCEPTANCE POLICIES

OF

WSRE-TV FOUNDATION, INC.

JUNE 2003

Introduction

In order to protect the interests of the WSRE-TV Foundation, Inc. ("Foundation") and the persons and other entities who support its programs, these policies are designed to assure that all gifts to, or for the use of, the funds are structured to provided maximum benefits to both parties.

This document will focus on both current and deferred gifts, with special emphasis on various types of deferred gifts and gifts of non-cash property.

The goal is to encourage funding of the Foundation funds without encumbering the organization with gifts which may prove to generate more cost than benefit, or which are restricted in a manner which is not consistent with the goals of each fund.

To optimize funding from individuals and other entities, the Foundation must be capable of responding quickly, and in the affirmative where possible, to all gifts offered by prospective donors. It is understood that except where stated otherwise, these policies are intended as guidelines, and that flexibility must be maintained since some gift situations can be complex, and decisions only made after careful consideration of a number of interrelated factors. Therefore, these policies will in some instances require that the merits of a particular gift be considered by the Board of Directors of WSRE-TV Foundation or their designees (the "Board") and a final decision be made only by that body.

I. Outright Gifts

A. Cash

1. As deemed appropriate by the board, gifts in the form of cash and checks shall be accepted regardless of amount unless, as in the case of all gifts, there is a question as to whether the donor has sufficient title to the assets or is mentally competent to legally transfer the funds as a gift to the Foundation.

2. All checks must be made payable to the WSRE-TV Foundation, Inc. and shall in no event be made payable to an employee, agent, or volunteer for the credit of the Foundation.

B. Publicly Traded Securities

1. Publicly traded securities which are traded on recognized national exchanges shall be accepted by the Foundation. It should be anticipated that such securities will be immediately sold by the Foundation. In no event shall an employee or volunteer working on behalf of the Foundation commit to a donor that a particular security will be held by the Foundation unless authorized to do so by the Board.

C. Closely Held Securities

1. Non-publicly traded securities may only be accepted after approval of the Board.

2. Such securities may be subsequently disposed of only with the approval of the Board.

D. Real Property

1. No gift of real estate shall be accepted without prior written approval of the Board.

2. No gift of real estate shall be accepted without first being appraised by a party chosen by the Board who shall have no business or other relationship with the donor.

3. In general, residential real estate will be accepted unless the Board shall determine the property is not suitable for acceptance as a gift.

4. Real estate shall not be accepted to fund a charitable gift annuity without seeking an opinion as to the permissibility of this action under the laws of the state or states involved and approval by the Board.

5. Special attention shall be given to the receipt of real estate encumbered by a mortgage, as the ownership of such property may give rise to unrelated business income for the Foundation and disqualification of a certain split interest gifts unless handled in a proper manner.

6. As a prerequisite to accepting real estate the donor shall provide evidence satisfactory to the Board that (i) such real estate is not contaminated by any hazardous or toxic materials or substances and (ii) such real estate is not being used and has never been used for any activities directly or indirectly involving the generation, use, treatment, storage, disposal, release or discharge or any hazardous or toxic materials or substances, and (iii) such real estate has no association to wetlands.

E. Tangible Personal Property

1. Jewelry, artwork, collections and other personal property with an estimated value of over $1,000.00 may only be accepted by the Board or such other person or persons authorized to do so by the Board.

2. No personal property shall be accepted by the Foundation unless there is reason to believe the property can be liquidated. No personal property shall be accepted that obligates the Foundation to ownership of it in perpetuity. No perishable property or property which will require special facilities or security to properly safeguard will be accepted without prior approval of the Board.

3. Notwithstanding the foregoing, if there is reason to believe personal property has a value of $5,000.00 or more, it may only be accepted after receipt and review by the Board or those empowered to act on its behalf, of an appraisal qualified under the terms of the Internal Revenue Code governing gifts of property of this type.

4. Only the Board or persons authorized by the Board to do so may represent to a donor that property will or will not be held by the Foundation for a requisite period of time or for purposes related to its tax-exempt status. The Foundation will, as a matter of corporate policy, cooperate fully in all matters related to IRS investigations of non-cash charitable gifts.

F. Other Property

1. Other property of any description including mortgages, notes, copyrights, royalties, easements, whether real or personal, shall only be accepted by action of the Board or persons duly acting on its behalf.

II. Deferred Gifts

A. Bequests

1. Gifts through wills (bequests) shall be actively encouraged by the Foundation.

2. In the event of inquiry by a prospective legator, representations as to the future acceptability of property proposed to be left to the Foundation in a will or other deferred gift shall only be made in accordance with the terms and provisions of this document.

3. Gifts from the estates of deceased donors consisting of property which is not acceptable shall be rejected only by action of the Board. The legal counsel of the Endowment Fund shall expeditiously communicate the decision of the Board to the legal representatives of the estate.

4. Attempts shall be made to discover bequest expectancies wherever possible in order to reveal situations which might lead to unpleasant donor relations in the future. Intended bequests of property other than case or marketable securities should be brought to the attention of the Board and every attempt be made to encourage the donor involved to conform his or her plan to the Endowment Fund policy.

B. Charitable Remainder Trusts

1. In general, the Endowment Fund will not serve as trustee of a charitable remainder trust for its benefit. This policy may only be waived by a written resolution of the Board.

2. In general, any corporate fiduciary with trust powers in the jurisdiction(s) where the Endowment Fund conducts business will be acceptable to the Endowment Fund.

3. The fees for management of a charitable remainder trust will only be paid by the Endowment Fund upon approval of the Board.

4. The Board and other employees and volunteers acting on behalf of the Endowment Fund should become familiar with the types of property generally accepted by corporate fiduciaries as suitable contributions to charitable remainder trusts and employees or

others acting on behalf o the Endowment Fund shall not encourage donors to make gifts of any property to charitable remainder trusts which are not in keeping with such guidelines.

5. No representations shall be made by any employee or other persons acting on behalf of the Endowment Fund as to the manner in which charitable remainder trust assets will be managed or invested by a corporate fiduciary.

6. Charitable remainder trusts and all other deferred gifts shall be encouraged as a method of making gifts to the Endowment Fund. Such trusts shall not be marketed as tax avoidance devices or as investment vehicles, as it is understood such activity may violate federal and/or state securities regulations.

7. No Charitable Remainder Trust shall be encouraged which names as income beneficiaries individuals under 35 years of age or which names more than two income beneficiaries. No charitable remainder trust shall be encouraged where it is determined that the net present value of the remainder interest in the trust is less than 35% of value of the funds transferred to the trust, as it is felt that it is generally unwise to encourage donors of a young age to make such gifts, as this may have a detrimental impact on future current giving. No minimum amount is required to establish a Charitable Remainder Trust; however, the Board shall approve on a case-by-case basis any charitable remainder trusts prior to acceptance.

C. Pooled Income Funds

1. A corporate fiduciary will be selected to manage the fund.

2. The Foundation will pay the administrative fees of managing the pooled fund until such time as the Board shall determine otherwise.

3. No income beneficiary in the fund may be less than 35 years of age without prior approval of the Board.

4. There shall be no more than two income beneficiaries allowed in connection with each contribution to the fund.

5. The minimum initial contribution to the fund shall be $2,500.

6. The minimum additional contribution by a participant in the fund shall be $1,000.

7. The corporate fiduciary shall furnish guidelines governing the acceptance of property other than cash as contributions to the Foundation Pooled Income Fund. Such guidelines shall be adopted by the Board and shall be incorporated by reference in these gift acceptance policies.

8. No representation of the fund shall be made which could be construed as marketing the fund as an investment or security of any type. All disclosures required by state and federal regulatory agencies shall be made in a thorough and timely manner.

D. Charitable Gift Annuities

1. No Gift Annuity shall be accepted which names an income beneficiary under 35 years of age without prior approval of the Board.

2. In keeping with the state laws, there shall not be more than the allowed income beneficiaries for each Gift Annuity.

3. The minimum initial contribution for a Gift Annuity shall be $2,500.

4. The minimum contribution for an additional Gift Annuity by an individual who has previously entered into a Gift Annuity agreement shall be $1,000.

E. Life Estate Gifts

1. Donors shall generally not be encouraged to make gifts of real property to the Foundation under which they maintain a life interest in the property.

2. This policy is based on the fact that such transfer are often not in the best interest of the donor involved, and there is potential for negative publicity for the Foundation should a donor have a need to sell the property to generate funds, only to find that a relatively small portion of the proceeds would be available to the donor as owner of the life estate.

3. Such gifts may be accepted by approval of the Board in situations where the asset involved appears to be a minor portion of the donor's wealth, and the committee is satisfied that there has been full disclosure to the donor of the possible future ramifications of the transaction.

F. Gifts of Life Insurance

1. The Foundation will encourage donors to name the Foundation to receive all or a portion of the benefits of life insurance policies which they have purchased on their lives.

2. The Foundation will not, however, as a matter of course agree to accept gifts from donors for the purpose of purchasing life insurance on the donor's life. Exceptions to this policy will be made only after researching relevant state laws to assure that the Foundation has an insurable interest under applicable state law.

3. No insurance products may be endorsed for use in funding gifts to the Foundation without Board approval.

4. In no event shall lists of the Foundation's donors be furnished to anyone for the purpose of marketing life insurance. This policy is based on the fact that this practice represents a potential conflict of interest, may cause donor relations problems, and may subject the Foundation to state insurance regulations should the activity be construed as involvement in the marketing of life insurance.

III. PAYMENT OF FEES RELATED TO GIFTS TO WSRE-TV FOUNDATION, INC.

A. Finder's Fees or Commissions

1. In general, the Foundation will pay no fee to any person as consideration for directing a gift to the Foundation. It is understood that such fees may or may not be legal and that in the case of irrevocable deferred gifts which involve management of assets, the payment of such fee may subject the Foundation and its management and board of directors to federal and state security regulation.

2. In no event whatsoever will a commission or finder's fee of any type be paid to any party in connection with the completion of a gift to the Foundation without prior written approval of the Board and subsequent written notification to the donor involved of the amount and recipients of any such fee.

B. Professional Fees

1. The Foundation will pay reasonable fees for professional services rendered in connection with the completion of a gift of the Foundation. Such fees will be paid only with prior written approval of the Board.

2. Such fees will be paid only following discussion with and approval by the donor.

3. Fees shall be reasonable, and directly related to the completion of a gift. They shall be limited to appraisal fees by persons who are competent and qualified to appraise the property involved and who have no conflict of interest, legal fees for the preparation of documents, accounting fees incident to the transaction, and fees of "fee for service" financial planners. In the case of financial planners, such persons must aver in writing that they are compensated only through fees for services rendered and that they are not compensated for the sale of products to clients. This distinction is vital in avoiding the payment of commissions which could be construed as triggering securities regulation.

4. In the case of legal, accounting, and other professional fees an attempt shall be made by the Board to ascertain the reasonableness of these fees prior to payment.

5. In cases where the person receiving fees were initially employed by the donor and the Foundation is asked to pay the fees involved, the donor shall be notified that the payment of such fees may result in taxable income to the donor in the amount of the fees paid.

6. In situations where advisors retained by the Foundation prepare documents or render advice in any form to the Foundation and/or a donor to the Foundation, it shall be disclosed to the donor that the professional involved is in the employ of the Foundation and is not acting on behalf of the donor and that any documents or other advice rendered in the course of the relationship between the Foundation and the donor shall be reviewed by counsel for the donor prior to completion of the gift.

IV. Restrictions

A. Gift Use Restrictions

1. No restrictions on how gifts may be used by the Foundation will be honored without prior approval of the Board in the case of current gifts or subsequent approval by the Board in the case of gifts received by will or other gift which is effective at death which has not been previously approved by the board.