

### **Schedule G Explanations**

**Question 2a: Are you a successor to an organization other than a for-profit organization? Answer “Yes” if you have taken or will take over the activities of another organization; or you have taken or will take over 25% or more of the fair market value of the net assets of another organization. If “Yes,” explain the relationship with the other organization that resulted in your creation.**

International Development Enterprises (“iDE”) formed The Greenhouse Project LLC, a disregarded entity, on April 24, 2012 to manage the transition of the historic Horse Barn at 1031 33rd street in Denver, Colorado into a shared office space for international non-profit organizations. After the renovation of the building was completed in June 2013, iDE sought to transition the building and its programming into a new non-profit organization with a mission to “build a community of innovators who grow lasting solutions to global poverty.” This transition was undertaken due to a determination by iDE’s board of directors and other stakeholders and tenants at the newly-named “Posner Center for International Development” that it would be in the best interests of all parties if iDE focused on its own mission to create income and livelihood opportunities for poor rural households overseas, and the Posner Center was allowed to grow and thrive with its own entity and management structure. As a result, the “Posner Center for International Development” was formed as a Colorado non-profit corporation on December 13, 2013, and The Greenhouse Project LLC, including all of its assets, was transferred to this new entity on December 20, 2013.

**Question 2b: Provide the tax status of the predecessor organization.**

International Development Enterprises is a 501(c)(3) public charity.

**Question 2c: Did you or did an organization to which you are a successor previously apply for tax exemption under section 501(c)(3) or any other section of the Code? If “Yes,” explain how the application was resolved.**

Yes, International Development Enterprises (iDE) is a 501(c)(3) public charity. iDE’s IRS 501(c)(3) determination letter is attached as Exhibit 1.

**Question 2e: Explain why you took over the activities or assets of another organization.**

See answer to Question 2a.

**Question 3: Provide the name, last address, and EIN of the predecessor organization and describe its activities.**

International Development Enterprises is a 501(c)(3) organization with a mission to create income and livelihood opportunities for poor rural households. With a head office in Denver, CO, as well as national organizations in Canada and the UK, iDE presently operates in eleven countries in Africa, Asia, and Latin America. iDE views access to water as the entry point to creating income opportunities for poor rural households. The organization identifies locations where improved access to water can have a positive impact, and then offers affordable technologies for lifting, storing, and distributing that water. iDE also looks for ways to reduce on-farm costs and increase margins available from market access and post-harvest activities. The Greenhouse Project LLC was only a small part of iDE’s global operations.

**Question 4: List the owners, partners, principal stockholders, officers, and governing board members of the predecessor organization:**

The principle officers and board members of International Development Enterprises (iDE), a 501(c)(3) non-profit organization, are:

Robert Hill, Board Chair  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Ted Paetkau, Vice Chair  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Norman Fiske, Finance Committee Chair  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Andrew Hunt, Executive Committee Member-at-Large  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Shoa Asfaha  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Frank DeFehr  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Tom Ebling  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

William A. Fast  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Melissa Ho  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Charles Kane  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Joel Lipsitch  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Paul Polak  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Jenny Rohde  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Mohan Uttarwar  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Dan Wessner  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

Les Woodward  
1031 33<sup>rd</sup> Street, Suite 270, Denver, CO 80205

**Question 5: Do or will any of the persons listed in line 4, maintain a working relationship with you? If “Yes,” describe the relationship in detail and include copies of any agreements with any of these persons or with any for-profit organizations in which these persons own more than a 35% interest.**

International Development Enterprises remains as a tenant of the Posner Center’s shared office space, and retains a position on the board of directors of the Posner Center for International Development. iDE is a valued member of our community of over 60 tenants, and will continue to be involved as the organization grows.

**Question 6a: Were any assets transferred, whether by gift or sale, from the predecessor organization to you? If “Yes,” provide a list of assets, indicate the value of each asset, explain how the value was determined, and attach an appraisal, if available. For each asset listed, also explain if the transfer was by gift, sale, or combination thereof.**

The Greenhouse Project LLC and all of its assets were purchase by and transferred to the Posner Center for International Development on December 30, 2013. A copy of the Purchase Agreement is attached as Exhibit 2. The assets held by The Greenhouse Project LLC and transferred to the Posner Center for International Development are documented in PART IX of Form 1023 and in associated attachments related to that part.

**Question 6b: Were any restrictions placed on the use or sale of the assets? If “Yes,” explain the restrictions.**

A three-quarters majority of tenant directors is required for any assignment of the Master Lease held by The Greenhouse Project LLC, as well as for other decisions relating to the operations and finances of The Greenhouse Project LLC. These restrictions are detailed in Section 5.7 of the Purchase Agreement.

**Question 6c: Provide a copy of the agreement(s) of sale or transfer.**

A copy of the Purchase Agreement documenting the transfer of The Greenhouse Project LLC to the Posner Center for International Development is attached as Exhibit 2. The iDE Sublease is attached as Exhibit 3.