

THE CFIDS ASSOCIATION OF AMERICA, INC.

Financial Statements

For Year Ended
December 31, 2004

THE CFIDS ASSOCIATION OF AMERICA, INC.

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Report of Independent Auditors

The Board of Directors
The CFIDS Association of America, Inc.
Charlotte, North Carolina

We have audited the accompanying statement of financial position of The CFIDS Association of America, Inc. (the Association) as of December 31, 2004, and the related statements of activities and changes in net assets, functional expenses, and cash flows for the year then ended. These financial statements are the responsibility of the Association's management. Our responsibility is to express an opinion on these financial statements based on our audit. As described in Note 1, the prior year summarized comparative information has been derived from the Association's 2003 financial statements; and in our report dated March 26, 2004, we expressed an unqualified opinion on those financial statements.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of The CFIDS Association of America, Inc. as of December 31, 2004, and the changes in its net assets, and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

In accordance with *Government Auditing Standards*, we have also issued our report dated April 6, 2005, on our consideration of the Association's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of our audit.

The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by U.S. Office of Management and Budget Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*, and is not a required part of the financial statements. Such information has been subjected to the auditing procedures applied in the audit of the financial statements and, in our opinion, is fairly stated, in all material respects, in relation to the financial statements taken as a whole.

Cherry Bekaert & Holland, LLP

Charlotte, North Carolina
April 6, 2005

The CFIDS Association of America, Inc.

Statement of Financial Position
December 31, 2004
(With Comparative Totals for December 31, 2003)

	December 31, 2004			Totals	December 31, 2003
	Unrestricted	Temporarily Restricted	Permanently Restricted		
Assets					
Current assets					
Cash and cash equivalents	\$ 829,800	\$ 444,295	\$ -	\$ 1,274,095	\$ 819,293
Contributions receivable	-	35,000	-	35,000	69,741
Government grants receivable	80,940	-	-	80,940	174,692
Other receivables	3,498	-	-	3,498	4,950
Inventories	1,017	-	-	1,017	742
Investments	4,637	887	5,400	10,924	3,183
Prepaid expenses	12,722	-	-	12,722	9,248
Total current assets	932,614	480,182	5,400	1,418,196	1,081,849
Property and equipment					
Office furniture and fixtures	88,548	-	-	88,548	69,709
Computers and related equipment	113,543	-	-	113,543	108,605
Leasehold improvements	25,872	-	-	25,872	25,872
	227,963	-	-	227,963	204,186
Less accumulated depreciation	(177,746)	-	-	(177,746)	(168,146)
Net property and equipment	50,217	-	-	50,217	36,040
Cash surrender value of life insurance	-	16,144	-	16,144	16,790
 Total assets	\$ 982,831	\$ 496,326	\$ 5,400	\$ 1,484,557	\$ 1,134,679

The accompanying notes are an integral part of these financial statements.

	December 31, 2004			Totals	December 31, 2003
	Unrestricted	Temporarily Restricted	Permanently Restricted		
Liabilities and Net Assets					
Current liabilities					
Accounts payable	\$ 36,434	\$ -	\$ -	\$ 36,434	\$ 72,511
Accrued payroll and payroll taxes withheld	11,385	-	-	11,385	24,046
Unearned dues revenue	70,660	-	-	70,660	79,806
Obligation under capital lease - current portion	6,171	-	-	6,171	3,958
Total current liabilities	124,650	-	-	124,650	180,321
Other liabilities					
Obligation under capital lease less current portion	20,057	-	-	20,057	3,061
Total liabilities	144,707	-	-	144,707	183,382
Net assets					
Unrestricted					
Undesignated	665,920	-	-	665,920	513,735
Designated	172,204	-	-	172,204	166,661
Total unrestricted	838,124	-	-	838,124	680,396
Temporarily restricted	-	496,326	-	496,326	270,901
Permanently restricted	-	-	5,400	5,400	-
Total net assets	838,124	496,326	5,400	1,339,850	951,297
Total liabilities and net assets	\$ 982,831	\$ 496,326	\$ 5,400	\$ 1,484,557	\$ 1,134,679

The CFIDS Association of America, Inc.

Statements of Activities and Changes in Net Assets
Year Ended December 31, 2004
(With Comparative Totals for Year Ended December 31, 2003)

	Year Ended December 31, 2004			Totals	Year Ended December 31, 2003
	Unrestricted	Temporarily Restricted	Permanently Restricted		
Support and revenues					
Public support:					
Contributions and grants	\$ 673,960	\$ 482,833	\$ 5,400	\$ 1,162,193	\$ 997,037
Federal funds:					
Government grants	-	587,463	-	587,463	667,905
Revenues:					
Membership dues	162,231	-	-	162,231	193,540
Educational material sales	7,087	-	-	7,087	12,622
Interest and other	7,158	887	-	8,045	3,317
	<u>176,476</u>	<u>887</u>	<u>-</u>	<u>177,363</u>	<u>209,479</u>
Assets released from restrictions					
Satisfaction of donor restrictions	845,758	(845,758)	-	-	-
Total support and revenues	<u>1,696,194</u>	<u>225,425</u>	<u>5,400</u>	<u>1,927,019</u>	<u>1,874,421</u>
Expenses and losses					
Program services:					
Research	167,663	-	-	167,663	254,113
Public Policy	209,031	-	-	209,031	236,031
Education	869,290	-	-	869,290	871,518
Supporting services:					
Management and general	97,252	-	-	97,252	96,547
Fund raising and development	196,004	-	-	196,004	172,832
	<u>1,539,240</u>	<u>-</u>	<u>-</u>	<u>1,539,240</u>	<u>1,631,041</u>
Loss (gain) on assets disposed	(774)	-	-	(774)	890
Total expenses and losses	<u>1,538,466</u>	<u>-</u>	<u>-</u>	<u>1,538,466</u>	<u>1,631,931</u>
Change in net assets	157,728	225,425	5,400	388,553	242,490
Net assets					
Beginning of year	<u>680,396</u>	<u>270,901</u>	<u>-</u>	<u>951,297</u>	<u>708,807</u>
End of year	<u>\$ 838,124</u>	<u>\$ 496,326</u>	<u>\$ 5,400</u>	<u>\$ 1,339,850</u>	<u>\$ 951,297</u>

The accompanying notes are an integral part of these financial statements.

The CFIDS Association of America, Inc.

Statement of Functional Expenses

Year Ended December 31, 2004

(With Comparative Totals for Year Ended December 31, 2003)

	Year Ended December 31, 2004						Year Ended December 31, 2003
	Program Services			Supporting Services			
	Research	Public Policy	Education	Management and General	Fundraising and Development	Totals	
Contract services	\$ 2,628	\$ 137,355	\$ 103,343	\$ 2,820	\$ 19,587	\$ 265,733	\$ 263,125
Speaker honoraria	-	-	5,000	-	-	5,000	15,000
Salaries	58,006	41,036	398,404	62,245	65,632	625,323	583,073
Payroll taxes	6,160	4,357	20,342	6,610	6,969	44,438	42,962
Printing and postage	4,228	1,321	107,995	1,476	43,241	158,261	177,088
Repairs and maintenance	1,334	944	6,243	1,432	1,509	11,462	5,071
Supplies	1,631	1,154	10,153	1,750	1,845	16,533	6,985
Educational materials/ cost of sales	-	-	8,763	-	-	8,763	5,307
Travel expenses	2,106	1,683	43,544	2,054	13,010	62,397	54,948
Exhibit Fees	-	-	39,130	-	-	39,130	19,062
Curriculum development meetings	-	-	705	-	-	705	3,053
Awareness and curriculum promotion	-	-	43,466	-	-	43,466	91,765
Event sponsorship	-	-	21,075	-	-	21,075	22,895
Event in-kind donations	-	-	-	-	16,375	16,375	-
Insurance	624	442	2,062	670	706	4,504	4,933
Telephone	2,948	1,466	7,028	2,084	2,258	15,784	14,701
Occupancy costs	8,389	5,935	27,707	9,002	9,492	60,525	59,158
Depreciation	3,891	2,752	12,849	4,175	4,402	28,069	25,037
Miscellaneous	2,766	2,086	11,481	2,934	10,978	30,245	42,659
Direct grants	72,952	8,500	-	-	-	81,452	194,219
Total expenses	\$ 167,663	\$ 209,031	\$ 869,290	\$ 97,252	\$ 196,004	\$ 1,539,240	\$ 1,631,041
Management and general expenses						\$ 97,252	\$ 136,354
Fundraising and development expenses						196,004	139,302
Total management and general, and fundraising and development expenses						\$ 293,256	\$ 275,656
Total support and revenue						\$ 1,927,019	\$ 1,874,421
Supporting services ratio						15.22%	14.71%

The accompanying notes are an integral part of these financial statements.

The CFIDS Association of America, Inc.

Statement of Cash Flows
Year Ended December 31, 2004
(With Comparative Totals For Year Ended December 31, 2003)

	Year Ending December 31,	
	2004	2003
Cash flows from operating activities		
Change in net assets	\$ 388,553	\$ 242,490
Adjustments to reconcile increase (decrease) in net assets to net cash used in operating activities:		
Depreciation	28,069	25,037
Loss (gain) on disposal of assets	(774)	890
Amortization of contributions receivable discount	(2,759)	-
In-kind contribution of investments	(10,045)	(3,183)
Reinvestment of investment earnings	(879)	-
Cash value annuity insurance contract	646	419
(Increase) decrease in operating assets:		
Pledges and other receivables	132,704	(67,652)
Inventories	(275)	214
Prepaid expenses	(3,474)	4
Decrease in operating liabilities:		
Accounts payable	(36,077)	33,461
Accrued payroll and payroll taxes withheld	(12,661)	(4,982)
Unearned dues revenues	(9,146)	(13,034)
Net cash provided by operating activities	473,882	213,664
Cash flows from investing activities		
Purchases of property and equipment	(17,985)	(15,530)
Proceeds from disposal of asset	1,000	-
Proceeds from sale of investments	3,183	-
Net cash used in investing activities	(13,802)	(15,530)
Cash flows used in financing activities		
Principal reduction of obligation under capital lease	(5,278)	(3,821)
Net increase in cash and cash equivalents	454,802	194,313
Cash and cash equivalents		
Beginning of year	819,293	624,980
End of year	\$ 1,274,095	\$ 819,293
Supplemental disclosure of cash flow information		
Noncash transaction:		
Issuance of capital lease for acquisition of equipment	\$ 30,856	\$ -

The accompanying notes are an integral part of these financial statements.

The CFIDS Association Of America, Inc.

Notes to Financial Statements
Year Ended December 31, 2004

Note 1 – Organization and Summary of significant accounting policies

Description of operations

The CFIDS Association of America, Inc. (the Association) is a non-profit corporation whose purpose is to conquer chronic fatigue and immune dysfunction syndrome (CFIDS). The Association works toward its mission by building recognition of CFIDS as a serious widespread medical disorder; securing a meaningful response to CFIDS from the federal government; stimulating high quality CFIDS research; improving health care providers' abilities to detect, diagnose and manage CFIDS; and providing information to persons with CFIDS and enabling the CFIDS community to speak with a collective voice. Substantially all of the Association's revenue is derived from membership dues, contributions from members and other interested parties, grants from foundations and government agencies, and sales of educational materials.

Basis of accounting

The accompanying financial statements are prepared on the accrual basis of accounting.

Classes of net assets

The financial statements report amounts separately by net assets classification. A summary of these classifications follows.

Unrestricted net assets are those currently available for use in the day-to-day operations of the Association and those resources invested in property and equipment. It is the policy of the Board of Directors to review its plans for future expansion and other future monetary requirements. From time-to-time, the Board of Directors will designate appropriate sums to assure adequate funds are available to assist in those estimated future monetary requirements. Such amounts are presented as designated net assets in the statement of financial position.

Temporarily restricted net assets are those implied or explicitly stipulated by donors for purpose or timing.

Permanently restricted net assets – Net assets consisting of contributions received from donors whose use by the Association is limited by permanent donor-imposed stipulations. The restrictions are for the donated assets to remain in perpetuity, and the Association does not have the right to invade the original principal.

Revenue recognition

Membership dues are recognized as revenue over the applicable membership period. The Association waives membership dues for individuals experiencing financial hardships. All contributions and grants are recognized as revenue when received, except for contributions, which are recognized as revenue at the time the contributions are unconditionally promised.

The CFIDS Association Of America, Inc.

Notes to Financial Statements (Continued)
Year Ended December 31, 2004

Note 1 – Organization and Summary of significant accounting policies (continued)

Donated services and assets

The Association periodically receives donated services for certain functions and donated assets. The assets are stated at their fair market value at time of donation. No amounts have been reflected in the financial statements for the services since they do not meet the criteria for recognition under SFAS No. 116, *Accounting for Contributions Received and Contributions Made*. The Association did, however, receive contributions of certain supplies and investments during the year ended December 31, 2004. In-kind contributions are included in contribution income in the accompanying statement of activities and are detailed as follows for the year ended December 31, 2004:

Investments	\$	10,045
Special event catering and supplies		<u>16,375</u>
Total in-kind	\$	<u>26,420</u>

Research grants

The Association awards grants for medical research projects in the field of CFIDS. To ensure that the most worthy and promising research projects are funded, the Association periodically convenes a Scientific Advisory Committee that advises the Association's Executive Committee of its Board of Directors. The Association's Executive Committee, heavily weighing the recommendations of this advisory committee, makes all funding decisions. Members of the Scientific Advisory Committee include internationally respected researchers and clinicians. Because these grants are contingent upon research contributions received and the Association's cash flow, these grants are not recognized as expenditures until payment occurs. However, at December 31, 2004, the Association had approved grants of \$244,758 that are available for disbursement in subsequent years.

Cash equivalents

For purposes of the statement of cash flows, the Association considers all highly liquid debt instruments with maturity of three months or less when purchased as cash equivalents.

Investments

Investments are recorded in accordance with the provisions of SFAS No. 124, *Accounting for Certain Investments Held by Not-for-Profit Organizations*. Under SFAS No. 124, investments in marketable securities with readily determinable fair values are valued in the statement of financial position at their fair value. Fair value is determined by reference to exchange or dealer-quoted market prices. If a quoted market price is not available, fair value is estimated using quoted market prices for similar investment securities. Changes in the fair value of securities are reflected as investment gains or losses in the accompanying statements of activities and changes in net assets.

The CFIDS Association Of America, Inc.

Notes to Financial Statements (Continued)
Year Ended December 31, 2004

Note 1 – Organization and Summary of significant accounting policies (continued)

Inventories

Inventories, which consist of educational materials, are recorded at the lower of cost (first-in, first-out) or market.

Property and equipment

Property and equipment items are stated at cost or at fair value at the date of donation, if contributed. Expenditures for acquisitions, renewals and betterments are capitalized, whereas maintenance and repair costs are expensed as incurred. Depreciation is charged to expense over the estimated useful lives of the assets principally using accelerated methods.

Beneficial interest in trust

In accordance with Statement of Financial Accounting Standards No. 136, *Transfers of Assets to a Not-for-Profit Organization or Charitable Trust That Raises or Holds Contributions for Others*, the Association recognizes contribution revenue from assets donated to a recipient organization held for the sole benefit of the Association. At December 31, 2004, the Association has assets held by recipient organizations totaling \$9,956. This balance is included in investments on the accompanying statement of financial position.

Cash surrender value of life insurance

The Association is the named beneficiary of a life insurance policy that covers a donor and his spouse. The policy has a face value of \$1,000,000 and is payable to the Association upon the death of the donor and his spouse. The policy continues to decrease in value as the policy matures, at which time, an additional premium will be payable from the Association in order to maintain the policy. For the year ended December 31, 2004, the decrease in the cash surrender value of life insurance was \$646.

Tax status

The Association is a not-for-profit voluntary health agency, exempt from federal and state income tax under Section 501(c)(3) of the Internal Revenue Code and Sections 105-125 and 105-130.11(a)(3) of the General Statutes of North Carolina. The Association has been designated as a "publicly supported" charity under Sections 509(a)(1) and 107(b)(1)(A)(vi) of the Internal Revenue Code.

Conflict of interest

All members of the Association's Board of Directors, committees of the board, and advisory committees to the Association are governed by a conflict-of-interest policy. This policy precludes members from voting on motions with respect to which they may have a conflict of interest. Conflict of interest is deemed to exist if the member would directly benefit, personally or professionally, from a motion that has been made.

The CFIDS Association Of America, Inc.

Notes to Financial Statements (Continued)
Year Ended December 31, 2004

Note 1 – Organization and Summary of significant accounting policies (continued)

Reclassifications

Certain reclassifications have been made to the prior year comparative totals in order to comply with the current year financial statement presentation. Such reclassifications had no effect on total net assets.

Concentrations of credit risk

Financial instruments, which potentially subject the Association to concentrations of credit risk, consist principally of contributions receivable and cash. The Association receives contributions from various entities and individuals located throughout the United States for various fund raising drives. Since these contributions are unsecured, the Association has no guarantee that these monies will be received. The Association places its cash with various financial institutions. The Federal Deposit Insurance Corporation (FDIC) insures these balances for up to \$100,000. Periodically, the Association maintains cash balances in excess of the amount insured by the FDIC.

The Association, similar to other organizations of its nature and size, periodically receives large contributions and grants from a relatively small number of individuals and/or organizations. The continued support of large donors cannot be determined with certainty. No individual contribution represented more than twenty percent (20%) of public support for the year ended December 31, 2004, however, thirty percent (30%) of the Association's support and revenue is derived from its contracts with the Centers for Disease Control and Prevention (CDC).

Prior year summarized information

The financial statements include certain prior-year summarized comparative information in total but not by net asset class. Such information does not include sufficient detail to constitute a presentation in conformity with accounting principles generally accepted in the United States of America. Accordingly, such information should be read in conjunction with the Association's financial statements for the year ended December 31, 2003, from which the summarized information was derived.

Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

The CFIDS Association Of America, Inc.

Notes to Financial Statements (Continued)
Year Ended December 31, 2004

Note 2 – Contributions receivable

Individual contributions receivable at December 31, 2004, are designated as follows: \$35,000 is restricted for use in Association public policy efforts. Unconditional promises are expected to be received in 2005.

Note 3 – Grants

The Association was awarded a contract of federal funds from the CDC for the purpose of educating multidisciplinary health care providers about CFIDS to enable timely detection and management of the illness, ultimately resulting in improved care for CFIDS patients. The Association also has a contract with CDC to provide public awareness of the existence of CFIDS. The funds for both of these contracts are received by the Association on a reimbursement basis. At December 31, 2004, \$80,940 is in the government grants receivable.

Note 4 - Investments

Investments are recorded at fair market value and include investments held in the Association's brokerage and beneficial interest account. The following is a summary of investments at December 31, 2004:

Equity securities	\$ 968
Mutual funds	<u>9,956</u>
	<u>\$ 10,924</u>

Note 5 – Capital leases

At December 31, 2004, property and equipment includes equipment under capital leases with a cost basis of \$30,856 and accumulated depreciation of \$6,171. Amortization of assets under capital lease is included in depreciation expense. The lease is interest free and interest has not been imputed as the amount is immaterial. The following is a schedule by year of future minimum lease payments under capital leases together with the present value of net minimum lease payments as of December 31, 2004.

2005	\$ 6,171
2006	6,171
2007	6,171
2008	6,171
2009	<u>1,544</u>
	26,228
Less amount representing interest	-
Present value of net minimum lease payments	<u>26,228</u>
Current maturities	<u>(6,171)</u>
Noncurrent maturities	<u>\$ 20,057</u>

The CFIDS Association Of America, Inc.

Notes to Financial Statements (Continued)
Year Ended December 31, 2004

Note 6 – Net assets

Unrestricted, board designated

Unrestricted net assets that have been designated by the Association's board of directors for future goals are comprised of the following at December 31, 2004:

Undistributed endowment earnings in endowment fund	\$ 3,669
Cash reserve for future years	<u>168,535</u>
	<u>\$ 172,204</u>

Temporarily restricted

Temporarily restricted net assets are available for the following purposes as of December 31, 2004:

Public policy activities	\$ 83,589
Research activities	297,871
Education	97,835
Endowment	887
Other donor specified	<u>16,144</u>
	<u>\$ 496,326</u>

Permanently restricted

Permanently restricted net asset is comprised of contributions made to the Association's endowment fund. These assets are held under an interest in a beneficial trust. At December 31, 2004, the principal balance of the endowment was \$5,400.

Note 7 – Net assets released from restrictions

Net assets were released from restrictions by incurring expenses satisfying the purpose during the year ended December 31, 2004, as follows:

Purpose restrictions accomplished:	
Government grants	\$ 587,463
Research grants, symposia, and related expenditures	68,062
Public policy activities	106,782
Educational activities	2,000
Donor specified	<u>81,451</u>
	<u>\$ 845,758</u>

The CFIDS Association Of America, Inc.

Notes to Financial Statements (Continued)
Year Ended December 31, 2004

Note 8– Leases

The Association leases office space used in its operations under an operating lease that expires in June 2007. The lease initially provides for a monthly rental of \$4,348 and is subject to annual increases including increases based upon the Consumer Price Index. The Association also leases office equipment under leases expiring in 2006

Future minimum lease commitments under the above operating leases are as follows at December 31, 2004

<u>Year ending</u> <u>December 31</u>	
2004	\$ 55,302
2005	52,276
2006	23,498
2007	<u>27,498</u>
	<u>\$ 158,574</u>

Rental expense incurred under operating leases was \$53,995 for the year ended December 31, 2004.

Note 9 – Financial instruments

SFAS No. 107, *Disclosures about Fair Value of Financial Instruments*, requires disclosure of the fair value of all financial instruments, including both assets and liabilities recognized and not recognized in the statement of financial position, for which it is practicable to estimate fair value.

The following methods and assumptions were used by the Association in estimating the fair value of its financial instruments. Fair value approximates carrying value for the following financial instruments due to their short-term nature: cash and cash equivalents, investments, various receivables and accounts payable. The fair value of capital lease payable is estimated by discounting future cash flows using interest rates available to the Association with similar terms and maturities.

	<u>Carrying</u> <u>Amount</u>	<u>Fair Value</u>
Capital leases payable	\$ <u>26,228</u>	\$ <u>23,462</u>

The CFIDS Association Of America, Inc.

Notes to Financial Statements (Continued)
Year Ended December 31, 2004

Note 10 – Benefit plan

The Association sponsors a cafeteria plan whereby employees may select from a list of available qualified benefits or additional wages up to ten percent (10%) of their annual gross compensation. Included in this cafeteria plan is an election that can be made by employees to have a designated amount contributed into their 403(b) Plan accounts. The Association's 403(b) retirement plan covers substantially all employees meeting certain service and age requirements. This plan is a defined contribution plan with voluntary employee participation. During 2004, the Association made contributions into this plan amounting to \$9,523.

Note 11 - Limits on nontaxable lobbying expenditures

The Association is covered under Section 501(h) of the Internal Revenue Code that permits a limited amount of nontaxable lobbying expenditures based upon varying percentages of total exempt purpose expenditures. This code section also imposes a ceiling (upper limit) for lobbying expenditures, above which 501(c)(3) organizations may be subject to revocation of tax-exempt status. The ceiling amounts are 150 percent of nontaxable lobby expenditures computed over a four-year averaging period. Both the ceiling and nontaxable amounts apply to direct and grassroots lobbying expenditures. The nontaxable amounts and the actual amounts spent by the Association for 2004 are listed below. The majority of the Association's public policy expenses are incurred in its monitoring of federal agencies, not on lobbying for specific legislation.

	<u>Allowable</u>	<u>Actual</u>
Direct lobbying	\$226,962	\$ 32,716
Grassroots lobbying	\$ 56,741	\$ 2,316