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15 Attorneys for Plaintiff Public.Resource.Org

16  
 17 IN THE UNITED STATES DISTRICT COURT  
 18 THE NORTHERN DISTRICT OF CALIFORNIA  
 19 SAN FRANCISCO DIVISION

20  
 21 PUBLIC.RESOURCE.ORG., a California non- ) Case No. 3:13-CV-02789-WHO  
 profit organization, )

22 Plaintiff, )

) **DECLARATION OF KENDALL TAGGART**

23 v. )

24 UNITED STATES INTERNAL REVENUE )  
 25 SERVICE, )

26 Defendant. )  
 \_\_\_\_\_ )

1 I, Kendall Taggart, declare as follows:

2 1. I am a reporter working for the Center for Investigative Reporting.

3 2. The Center for Investigative Reporting is a nonprofit journalism organization  
4 which specializes in in-depth reporting. More than 300 news outlets have featured our work. We  
5 were twice finalists for the Pulitzer Prize and we have won numerous other awards, including  
6 three George Polk Awards and the Barlett and Steele Gold Prize for investigative business  
7 journalism.

8 3. In 2012 and 2013, I worked with my colleague Kris Hundley of the Tampa Bay  
9 Times on a series of articles entitled America's Worst Charities. CNN joined our effort in March  
10 2013 as a third collaborator. The series took a systematic look at non-profit performance and was  
11 based on extensive use of the Form 990, state public record laws, and interviews. Copies of those  
12 stories may be viewed at <http://cironline.org/americasworstcharities>.

13 4. The series on America's Worst Charities generated enormous public interest and  
14 was viewed more than 10 million times. The database of disciplinary actions we compiled as part  
15 of our research is now being used by state regulators. That database can be used by the public and  
16 can be found at <http://charitysearch.apps.cironline.org>.

17 5. As part of our work on the series, we examined over 500 Form 990s. This allowed  
18 us to compile metrics such as the percent of revenue spent on solicitation costs. For example, we  
19 found that the Kids Wish Network (Employer ID 31-1579097) raised \$127.8 million through  
20 fundraising solicitation, but \$109.8 million of those funds were paid to solicitors and only \$18  
21 million was available to meet program costs.

22 6. As part of my work, I use a number of computational tools including the Python  
23 programming language and the MySQL and SQLite database management systems.

24 7. Much of our work on the series America's Worst Charities consisted of manually  
25 leafing through scans of non-profit returns and entering data into our database. To be able to  
26 provide the public with a decades worth of data from the 50 charities we profiled, we manually  
27 entered in 6 fields from 10 years worth of Form 990s. The process took us weeks. An example of  
28

1 the data we collected on Kids Wish Network is available at <http://www.tampabay.com/americas-worst-charities/charities/kids-wish-network-inc>.

2  
3 8. Working with scans of the Form 990 is a very tedious process. If this data were  
4 available in the Modernized e-File (MeF), our work would be substantially aided. With MeF  
5 format returns, we could focus much more intensely on analysis of the data instead of data entry.

6 9. If data were available in MeF format, a simple script in the Python programming  
7 language could be used to quickly load a data into a database management system.

8 10. I do not consider myself a computer programmer or computer expert. Like many  
9 other reporters, however, I view basic computer skills as a fundamental tool in my reporting. I  
10 believe many journalists besides myself would also be able to make very effective use of MeF  
11 format IRS forms and that availability of such data will result in more articles that examine the  
12 effectiveness and accountability of our nonprofit sector.

13 11. In addition to using the Form 990 for investigative reports such as America's Worst  
14 Charities, I consider the Form 990 to be one of the core tools of journalism for a large number of  
15 other kinds of articles. For example, if I were to write a profile of an executive who works for a  
16 nonprofit corporation or if a nonprofit corporation is the subject of a news article, one of the first  
17 sources I would examine is the Form 990 for that organization. In addition, while writing about  
18 other topics, I routinely check to see if individuals or companies have ties to a nonprofit, and go to  
19 the Form 990 to background those entities.

20 12. In conclusion, release of the Form 990 in Modernized e-File format would be of  
21 great use to me in my work as a journalist.

22 I declare under penalty of perjury under the laws of the United States of America that the  
23 foregoing is true and correct and that this declaration was executed this 19 day of September, 2014  
24 at Emeryville, California.

25 /s/ Kendall Taggart  
26 KENDALL TAGGART