Form ADV Part 2A & 2B

FIRM BROCHURE – FORM ADV PART 2A

This Brochure provides information about the qualifications and business practices of Church Organizers Foundation. If you have any questions about the contents of this Brochure, please contact us at 800-985-7851. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Church Organizers Foundation is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you can determine to hire or retain an adviser. Additional information about Church Organizers Foundation, is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Church Organizers Foundation is 284458.

Brochure amended on December 1, 2019

Item 1 – Cover Page

Please see information provided on the first page of this document.

Item 2 – Material Changes

There is one material change. Martin E. Lee changed his name back to the name given at birth. He is now legally Martin Edward Lee.

Our Brochure may be requested from our office at 800-985-7851 or at martin@churchorganizers.org . Additional information about Church Organizers Foundation is also available via the SEC's website www.adviserinfo.sec.gov . The SEC's website also provides information about any persons affiliated with Church Organizers Foundation who are registered, or are required to be registered, as investment adviser representatives of Church Organizers Foundation.

Item 3 – Table of Contents

Church Organizers Foundation
3148 Hagadorn Road, Mason, Michigan.
800-985-7851 (Toll-Free)
A Registered Investment Advisor with the states of California and Michigan

Item 4 – Advisory Business

Church Organizers Foundation ("The Foundation," "the Firm," "our," or "we") is an independent investment management firm that provides investment advice and portfolio management services on a continuing basis, including the appropriate allocation of managed assets among cash, bonds, stocks, exchange-traded funds, and mutual funds and the selection of specific securities that will provide diversification and help meet the client's stated investment objectives.

Church Organizers Foundation is a non-profit foundation controlled by Martin E. Lee, Anne R. Lee, and Rollins W. Trusty, Jr. and has provided investment advice and portfolio management services since 2016.

The Foundation executes a power of attorney prior to accepting discretionary authority to manage security accounts on behalf of clients.

The Foundation provides ***investment advice*** and ***educational services*** regarding all types of securities, our focus is on tailoring our advisory services to the individual client's need. We build client investment portfolios through the purchase of individual bonds and equities in order to provide better tax efficiency and avoid the layering of fees. Client investment guidelines may or may not limit the scope of potential investments. As a result, clients can impose restrictions on investing in certain securities or types of securities. When selecting securities and determining amounts to invest, we observe the investment guidelines and restrictions of the client. Investment guidelines and restrictions must be provided to us in writing.

In addition to investment advisory services, we also provide targeted financial advisory services on an as-needed basis. The financial advisory services include, but are not limited to, cash flow planning, retirement needs analysis, tax-efficient distribution strategies, charitable gift-giving and estate planning, employee benefits planning, annuity and insurance (life, disability, and long-term care) reviews, and education planning.

a. A conflict exists between the interests of the investment advisor and the interests of the client.
b. The client is under no obligation to act upon the investment advisor's recommendation, and
c. If the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through the investment adviser.

The Foundation does not participate in any wrap fee programs.

As of December 1, 2019, *The Foundation* has $12,276,325 in assets under management. All these assets are managed on a discretionary basis; while there are no assets managed on a non-discretionary basis.

Item 5 – Fees and Compensation

A) The specific way fees are charged by *The Foundation* is established in a client's written agreement. The annual fee for investment advisory services will be charged as a percentage of assets under management according to the schedule below. Lower fees for comparable services may be available from other sources.

Assets Under Management	*Fees*
$25,000 - $99,999	1.40%
$100,000 - $499,999	1.25%
$500,000 - $999,999	1.10%
$1,000,000 - $2,999,999	1.00%
$3,000,000 - $4,999,999	0.85%
Over $5,000,000	0.75%

B) Our fees are payable monthly, in advance, within ten (10) days following the beginning of the month for which said fees will be incurred. Our clients authorize the account custodian to debit their client account for the investment advisory fee or may request a direct billing method. The Foundation's financial advisor is compensated a percentage from these fees. At the inception of the relationship and each month thereafter, we will notify your custodian of the amount of the fee due and payable to *The Foundation* based on the fee schedule and contract. The custodian does not validate or check the fee, its calculation, or the asset value on which the fee is based. They will deduct the fee from your account or, if you have more than one account, from the account(s) you have designated to pay the advisory fees. In limited situations we may provide an alternate payment method. Each month you will receive a statement directly from your custodian showing all transactions, positions, and credits/debits into or out of your account; the statement will reflect the advisory fee paid by you to The Foundation.

C) Our clients may incur mutual fund, ETF expenses and/or custodian fees related to your account (e.g. ticket charges, annual account fees, etc.).

D) Advisory fees shall be pro-rated for capital contributions made during the applicable calendar quarter (except for de minimis contributions). Accounts opened in mid-month will be assessed a pro-rated management fee. Certain clients of *The Foundation* with pre-existing relationships may initially be charged fees which are than those set out above. Existing clients as of June 22, 2016 are charged under prior fee schedules. With regards to employee-related accounts and certain other accounts, the quarterly fees may be less, depending upon several factors, including portfolio size, length of employment, and relationship to the employee. In our sole discretion, we may waive the minimum account size.

E) Neither *the Foundation* nor our supervised advisor receive compensation from mutual fund sales charges or services fees.

Additional Fees and Expenses

Advisory fees payable to us do not include all the fees you will pay when we purchase or sell securities in your account(s). The following list of fees or expenses are what you pay directly to third parties whether a security is being purchased, sold, or held in your account(s) under our management. We do not receive, directly or indirectly, any of these fees charged to you. They are paid to your broker, custodian or the mutual fund or other investment you hold. These fees may include brokerage commissions, transaction fees, exchange fees, SEC fees, advisory fees and administrative fees charged by mutual funds ("MF"), exchange-traded funds ("ETFs"), money markets, or money market mutual funds, advisory fees charged by sub-advisers (if any are used for your account), custodial fees, deferred sales charges (on MF or annuities), early redemption fees (charged by MFs), transfer taxes, wire transfer and electronic fund processing fees, and commissions or mark-ups/mark-downs on security transactions.

In addition, we do not have or employ any employee that receives, directly or indirectly, any compensation from the sale of securities or investments that are purchased or sold for your account or to which we provide consulting expertise/services. As a result, we are a fee-only investment adviser. We do not have any potential conflicts of interest present that relate to any additional (and undisclosed) compensation from you or your assets that we manage. All fees are subject to negotiation. We will not change our fees without thirty (30) days advance written notice.

Consulting Services

In rare instances, *The Foundation* may be asked to provide services that are above and beyond the usual financial advisory services. Consulting services and fees will be mutually agreed to in advance. Fees for these consulting services will be billed on an hourly basis at rates ranging from $100/hour to $200/hour. The client may select either to deduct the fee from the assets under management or be billed directly. The Foundation's financial advisor is compensated a percentage of the fees deducted from client accounts or billed directly. Our fees are payable monthly, within ten (10) days following the completion of the services provided.

Termination of Investment Management Services

A client may terminate an agreement with us at any time upon 30 days written notice. *The Foundation* is not under any obligation to repay any portion of the fees paid by the client prior to the termination of this agreement.

Termination of Consulting Services

Consulting services may be immediately terminated upon written notice by either party.

Item 6 – Performance Based Fees and Side-by-Side Management Fees

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) or side-by-side management fees.

Item 7 – Types of Clients

We provide our services to several different types of clients.

- Trusts and estates
- Pastors and School Teachers
- Endowments, foundations, and other charitable organizations
- Charitable Trusts (CRTs, CRUTs, NIMCRUTS)
- Corporations and other business entities

The minimum initial investment is $25,000 of total assets under management (We reserve the right to waive the minimum account size.). Fees and investment minimums are subject to negotiation and may differ based on several factors including the amount of assets, number of accounts, level of contributions/distributions, and the number and range of supplemental advisory and client-related services.

Item 8 – Methods of Analysis, Investment Strategies, and Risk of Loss

METHODS OF ANALYSIS

The Foundation understands that investing in securities involves risk of loss that clients should be prepared to bear. At the same time, we utilize methods of security analysis which are attentive to risk factors that may impact the value of a security. Research information is generated both internally and obtained from external sources. We carefully study this information and evaluate it based on numerous quantitative and qualitative considerations. Martin E. Lee, Chief Investment Officer, manages the research and analysis function. Below is a partial listing of external research sources we may utilize:

- Prospectuses and filings with the Securities and Exchange Commission including annual reports, 10Ks and 10Qs
- Corporate rating services
- Research materials prepared by others
- Company earnings announcements, news releases, and websites
- Financial newspapers, magazines, and industry publications
- Analyst conference calls
- Government and economic reports

Our primary method of analysis is fundamental analysis which is supplemented on a limited basis with technical analysis techniques. Following is a description of fundamental and technical security analysis methods.

Fundamental Analysis

The Foundation employs a comprehensive, fundamental approach to security analysis. Fundamental analysis involves a bottom-up assessment of a company's potential for success considering many factors including its financial condition, earnings outlook, strategy, management, industry position, and economic and market conditions. A primary objective of fundamental analysis is to determine a reasoned value for a security that can be compared with its current market price. A decision to buy, sell, or hold a particular security in a client's portfolio is directly influenced by our expectations of how fundamental factors are anticipated to impact its long-term valuation. Under this approach we routinely examine a company's financial statements and concurrently consider the impact that prevailing economic, political, and industry circumstances may have on its future value. After researching and analyzing relevant fundamental information, we develop an initial judgment of a security's investment potential.

Technical Analysis

Technical security analysis concentrates on historical trends and their relationships among and between various quantitative measures. These variables are typically displayed in charts and graphs and studied to determine if a pattern is repeating, ongoing, or non-existent. Minimal attention is given to a company's present earnings, strategy, products, services, or other pertinent qualitative issues. In sum, this is a data, statistical, or quantitative only approach to security analysis. Examples of technical analysis factors include, but are not limited to, market trading volume, price levels, and price movements. *The Foundation* employs technical security analysis on a limited basis and as a supplement to fundamental security analysis discussed above.

INVESTMENT STRATEGIES

The Foundation employs an investment philosophy emphasizing portfolio management that is custom tailored to the needs of each client. We begin the investment process by carefully listening to the client and gaining a thorough understanding of the client's unique goals, risk tolerance, time horizon, and other circumstances. We then determine an appropriate investment strategy for the client based on that understanding. For institutional clients, this would be memorialized in their investment policy statement. Further customizing of the portfolio takes into consideration individual client preferences such as social investing, concentrated positions, existing holdings, taxes, and other considerations. The investment strategy provides a framework for determining the asset allocation that properly balances risk and reward over a long-term time horizon. Asset allocation is the relative mix of cash, fixed income, and equity securities suitable for a client's investment portfolio.

The Foundation believes investment risk is lessened when a portfolio is diversified. Diversification is a disciplined long-term investment strategy that helps prevent overexposure to asset classes or specific securities and identifies a fitting time when exposure to an undervalued asset class or security may be present. We combine asset allocation with diversification to ensure a client's portfolio will be managed in a prudent manner. We then implement the strategy to achieve the client's investment objectives.

Although strategies can be changed if necessary, adhering to the asset allocation over the pre-determined time horizon seeks to provide enhanced portfolio returns with reduced volatility. We use a dynamic and disciplined investment approach in selecting individual equity and fixed income securities. This approach allows for greater flexibility, greater tax efficiencies, and lower expenses. With limited exceptions, *The*

Foundation does not utilize loaded mutual funds thereby avoiding inefficiencies and additional layers of fees. Our security selection process seeks to maximize growth while remaining within the risk tolerance level of each client.

Capital preservation, however, is also an important consideration of our investment philosophy. We believe it is inappropriate to take unwarranted risk in either portfolio structure or individual securities. Portfolio turnover is limited; however, we continuously review investment alternatives and implement changes when more appealing and suitable opportunities become available to potentially increase total return. As appropriate, we will invest in public companies that are expected to benefit from movements in commodity prices without exposing a portfolio to the volatility of derivatives that is inherent with futures and options contracts. We will also invest in real estate via publicly traded real estate investment trusts ("REITs") if appropriate. We believe these non-traditional asset classes further diversify the portfolio and reduce risk. In both cases, we select highly liquid investments.

Description of Principal Security Types

Equity securities represent an ownership interest, or the right to acquire an ownership interest, in an issuer. Different types of equity securities provide different voting and dividend rights and priority in the event of the bankruptcy of the issuer. Equity securities include common stocks, preferred stocks, convertible securities, and warrants. Equity investments in client portfolios are substantially in common stocks.

Fixed income (debt) securities are used by issuers to borrow money. The issuer usually pays a fixed, variable, or floating rate of interest, and must repay the amount borrowed, usually at the maturity of the security. Some debt securities, such as zero-coupon bonds, do not pay current interest but are sold at a discount from their face values. Fixed income securities include corporate bonds, government securities, mortgage and other asset-backed securities.

Equity - Principal Investment Strategy

Client assets allocated to equities are primarily invested in a diversified portfolio of publicly traded common stocks. We invest in U.S. domestic companies and achieve international and global diversification through either direct investment in foreign-based companies or by investing in U.S. corporations with an international scope. We will also invest in publicly traded REITs and exchange-traded funds (ETFs) if we feel those types of investments are appropriate for the client. Investments in equity portfolios are intended to be long-term with an emphasis on capital appreciation and dividend income as a secondary decision. We are not constrained by any particular investment style. This means we can invest in large, mid, or small cap stocks having value, blend, or growth qualities. However, we generally invest most equity assets in large cap stocks. The chart below depicts how an equity portfolio normally is distributed.

Fixed Income – Principal Investment Strategy

Client assets allocated to fixed income securities are primarily invested in a diversified portfolio of publicly traded corporate bonds, government securities, agency securities and municipal bonds. Fixed income investments are managed to generate income as well as add stability to our clients' portfolios with the key focus being safety. A substantial majority of fixed income investments are in domestic corporate securities rated investment-grade or better at the time of purchase by Standard and Poor's or Moody's. Investment-grade securities include all types of fixed income debt instruments that are of medium or higher quality. Diversification is enhanced by investing in a variety of issuers, in different sectors, and in different industries. To lessen the impact of changing interest rates and inflation, portfolios are comprised of holdings having assorted maturity dates usually ranging from 1 to 10 years. We plan to hold bonds until maturity, which results in lower turnover and costs to our clients and a more predictable income stream. We continually monitor our fixed income holdings, interest rates, and market conditions for circumstances which may require an action prior to a bond's maturity.

RISK OF LOSS

Investing in securities involves risk of loss that clients should be prepared to bear. Security markets, especially foreign markets, are volatile and can decline significantly in response to adverse issuer, political, regulatory, market, or economic developments. When securities are sold, they may be worth more or less than what they were purchased for, which means that you could lose money.

In the normal course of managing client equity and fixed income portfolios, *The Foundation* does not:

1. Buy or sell futures or options contracts,
2. Conduct short-selling trading activities,
3. Utilize market timing strategies, or
4. Directly own commodities, precious metals or natural resources.

Principal Investment Risks

Many factors affect portfolio performance. Portfolio values change daily based on changes in market conditions and interest rates and in response to other economic, political, or financial developments. A portfolio's reaction to these events will be influenced by the types of securities it holds, the issuer's underlying financial condition, industry and economic sector matters along with the geographic location of an issuer, and the relative level of an investment in the securities. The following factors can significantly affect a portfolio's performance.

Market Volatility:

The value of equity and fixed income securities fluctuate in response to issuer, political, market, and economic developments. Fluctuations can be acute over the short as well as long term. Several parts of the market and different types of securities can react differently to these developments. For example, large cap stocks can react differently from small cap stocks, and "growth" stocks can react differently from "value" stocks. Events can affect a single issuer, issuers within an industry or economic sector or geographic region, or the market. The financial condition of a single issuer can impact the market. Terrorism and related geo-political risks have led, and may in the future lead, to increased short-term market volatility and may have adverse long-term effects on world economies and markets generally.

Interest Rate Changes:

Fixed income (debt) securities have varying levels of sensitivity to changes in interest rates. In general, the price of a debt security can fall when interest rates rise and can rise when interest rates fall. Securities with longer maturities and mortgage securities can be more sensitive to interest rate changes.

Foreign Exposure:

Foreign securities, foreign currencies, and securities issued by U.S. entities with substantial foreign operations can involve additional risks relating to political, economic, or regulatory conditions in foreign countries. These risks include fluctuations in foreign currencies; withholding or other taxes; trading, settlement, custodial, and other operational risks; and less stringent investor protection and disclosure standards of some foreign markets. All these factors can make foreign investments, especially those in emerging markets, more volatile and potentially less liquid than U.S. investments. In addition, foreign markets can perform differently from the U.S. market.

Issuer-Specific Change:

Changes in the financial condition of an issuer, changes in specific economic or political conditions that affect a particular type of security or issuer, and changes in general economic or political conditions can increase the risk of default by an issuer, which can affect a security or instrument's credit quality or value. The value of securities of smaller, less well-known issuers can be more volatile than that of larger issuers. Lower quality debt securities (those of less than investment-grade quality) and certain types of other securities tend to be particularly sensitive to these changes.

Item 9 – Disciplinary Information

The Foundation has never been the subject of an investment-related regulatory or legal complaint. No employee has ever been the subject of any disciplinary event.

A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which your firm or a *management person*

   1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any *felony*; (b) a *misdemeanor* that *involved* investments or an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses; NONE
   2. is the named subject of a pending criminal *proceeding* that involves an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses; NONE
   3. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation; or NONE
   4. was the subject of any *order*, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a *management person* from engaging in any *investment-related* activity, or from violating any *investment-related* statute, rule, or *order*. NONE

B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which your firm or a *management person*

   1. was *found* to have caused an *investment-related* business to lose its authorization to do business; NONE or
   2. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority NONE

      (a) Denying, suspending, or revoking the authorization of your firm or a *management person* to act in an *investment-related* business; NONE
      (b) Barring or suspending your firm's or a *management person's* association with an *investment-related* business; NONE
      (c) Otherwise significantly limiting your firm's or a *management person's investment-related* activities; NONE

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(d) Imposing a civil money penalty of more than $2,500 on your firm or a *management person*.

C. A *self-regulatory organization* (*SRO*) *proceeding* in which your firm or a *management person*

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; NONE or
2. was *found* to have been *involved* in a violation of the *SRO's* rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; NONE (ii) otherwise significantly limited from *investment-related* activities; NONE or (iii) fined more than $2,500. NONE

Item 10 – Other Financial Industry Activities and Affiliations

The Foundation is not engaged in any other financial industry activities other than giving investment and financial advisory advice. *The Foundation* does not sell products or services other than estate and investment advice to its clients. *The Foundation* does not have any arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment adviser, financial planning firm, futures commission merchant, commodity pool operator, commodity trading adviser, bank or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer or an entity that creates or packages limited partnerships.

Item 11 – Code of Ethics, Participation or Interest in Client Transaction and Personal Trading

The Foundation has adopted a Code of Ethics for all employees of the Firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All employees at *The Foundation* must acknowledge the terms of the Code of Ethics annually, or as amended.

The Foundation anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which *The Foundation* has management authority to effect, and may recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which *The Foundation*, its affiliates and/or clients, directly or indirectly, may have a position of interest. *The Foundation's* employees and persons associated with *The Foundation* are required to follow the Firm's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of The Foundation and its affiliates can trade for their own accounts in securities which are recommended to and/or purchased for *The Foundation's* clients.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of *The Foundation* will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of *The Foundation's* clients. In addition, the Code requires pre-clearance of many transactions and restricts certain trading near client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between *The Foundation* and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with *The Foundation's* obligation of best execution. *The Foundation* will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro-rata basis. Any exceptions will be documented. It is *The Foundation's* policy that the Firm will not affect any principal transactions for client accounts. *The Foundation* will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. Neither the Foundation nor any financial advisor recommends buys or sells for client accounts in which exists a material financial interest. *The Foundation's* clients or prospective clients may request a copy of the Firm's Code of Ethics by contacting the Firm.

Item 12 – Brokerage Practices

We will supervise and direct the investments in the client accounts subject to such limitations as the client imposes in writing, if any. *The Foundation*, with respect to the client's account and without prior consultation with the client, will (a) direct the purchase, sale, exchange, conversion, and otherwise trade in stocks, bonds and other securities including money market instruments, (b) direct the amount of securities purchased, sold, exchanged, and otherwise traded; and (c) place orders for the execution of such securities transactions.

All client assets are held by third-party custodians. *The Foundation* typically recommends that clients use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC as the custodian. TD Ameritrade Institutional provides us with access to its institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors. Prospective clients are hereby advised that lower brokerage fees for comparable services may be available from other sources. We have a duty to get best execution for our clients. Best execution is not only brokerage fees, but also involves price improvement and speed of execution. We periodically review our transaction costs considering current market circumstances, available published statistical analysis as well as other relevant information. In recommending a specific broker-dealer neither The Foundation nor any related person receives client referrals from a broker dealer or third party.

Allocation of Investment Opportunities and Orders

We have adopted the following policies and procedures related to the fair allocation of investment opportunities. These policies are designed to help ensure that each client receives fair and equitable treatment in the investment process.

- Investment ideas are equally disseminated among all appropriate investment professionals responsible for selecting investments.
- Transactions in the same security on behalf of more than one client are aggregated, when possible, to facilitate best execution. This results in all clients within the aggregate receiving the same average share price on the transaction.
- When orders cannot be aggregated, we employ a trading process that is fair among all clients, regardless of size.

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• IPOs are only allocated to accounts when the issuer meets the investment objectives of participating accounts as well as a review process for allocations.

• We do not short sell securities.

• Accounts in which our employees or affiliates have a beneficial interest, or in which The Foundation has a conflict of interest, do not receive preferential treatment.

• All clients receive fair and equitable treatment for investment opportunities that are too limited to be effectively allocated among all accounts.

When orders are generated, the decision on which accounts should participate, and in what amount, is based on the type of security or other asset, the present or desired structure of the various portfolios and the nature of the account's goals. Other factors include risk tolerance, tax status, permitted investment techniques and, for fixed income accounts, the size of the account and other practical considerations. As a result, we may have different price limits for buying or selling a security in different accounts. Portfolio information systems, portfolio reports and quality control reports permit us to consider these factors as appropriate.

When our investment professionals decide to sell a security regardless of tax considerations, both taxable and tax deferred accounts are eligible for sale simultaneously. In situations where tax gains influence the sale, securities in the tax-deferred accounts may be placed for sale first, as additional time is needed to consider the tax implications for each taxable account. Conversely, when tax losses influence the sale, The Foundation may prioritize taxable clients first, as the loss has a specific impact each year. In any event, the prioritization process is applied consistently over time.

Research Services

Additionally, TD Ameritrade Institutional also offers other services intended to help advisors manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession, and (iii) third-party investment research on their website. We do not select client custodians based on these features.

Soft Dollars

We do not participate in soft dollar arrangements.

Directed Brokerage

About client-directed brokerage, we are required to disclose that we may be unable to negotiate commissions, block or batch client orders or otherwise achieve the benefits described above, including best execution, if you limit our brokerage discretion. Directed brokerage commission rates may be higher than the rates we might pay for transactions in non-directed accounts. Also, clients that restrict our brokerage discretion may be disadvantaged in obtaining allocations of new issues of securities that we purchase or recommend for purchase in other clients' accounts. It is our policy that such accounts do not participate in allocations of new issues of securities obtained through brokers and dealers other than those designated by the client. As a rule, we encourage each client to compare the possible costs or disadvantages of directed brokerage against the value of the custodial or other services provided by the broker to the client in exchange for the directed broker designation.

Item 13 – Review Accounts

We regularly review client accounts on a daily, monthly, quarterly, semi-annual, and annual basis. While the nature of each review is somewhat different, they are purposefully designed to ensure each account is maintained in accordance with a client's goals and objectives or investment policy. These reviews effectively identify any issues that may require immediate attention. Appropriate actions are taken when necessary. Accounts are reviewed by Martin E. Lee, Executive Director – Chief Investment Officer.

Daily:

Monitor account activity.

Monthly:

- Compare asset allocation vs. target; reallocate as necessary
- Identify over/under-concentrated positions; adjust as necessary
- Evaluate cash balances considering known future cash needs and deposits; invest excess cash accordingly
- Identify large fluctuations in bond prices; act as necessary
- Reconcile any ending monthly balance differences between internal reporting system and custodian reported amounts
- Look for atypical transactions that might suggest unauthorized or inappropriate use of client assets by firm personnel or others. All withdrawals should be supported by client requests.

Quarterly:

Evaluate client performance in aggregate and versus other similarly allocated client accounts and against relevant benchmarks, determine cause for deviations (positive or negative), and, as appropriate, develop recommendations for potential portfolio changes.

Semi-Annual (applicable for our institutional clients who have an Investment Policy Statement (IPS):

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Perform an in-depth review of the account to ensure compliance with all the parameters laid out in the IPS. Notify client of any non-compliant items, if appropriate.

As Needed:

In addition to the reviews listed above, portfolio evaluations may also arise in response to changing client circumstances, goals and objectives or current market conditions.

Reports:

Written reports are furnished to our clients on a quarterly basis by TD Ameritrade Institutional. These reports include performance for the most recent quarter and YTD. For comparison purposes, performance is reported along with relevant and appropriate benchmarks. Additionally, the reports include current data regarding client accounts as of the report date – asset allocation, diversification metrics, fixed income ratings, asset balances per account and in the aggregate, and aggregate quarterly account activity. All clients receive monthly and/or quarterly statements from their portfolio custodian detailing all cash and asset transactions and activity as well as the asset balances for each security as of the report date.

Item 14 – Client Referrals and Other Compensation

We do not participate in any referral program or receive economic benefit from anyone who is not a client for providing investment advice or other advisory services. No such conflicts of interest exist.

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Item 15 – Custody

The Foundation does not have custody of any client accounts. Therefore, each client must select a custodian and will be required to pay any related custodian fees. Also, clients will incur brokerage and other transaction costs in the course of our management of their accounts. Clients will receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets.

Related Advisory Fees and Safeguards

Do you withdraw advisory fees directly from your *clients'* accounts? If you answered "yes", respond to the following:

(a) Do you send a copy of your invoice to the custodian or trustee while you send a copy to the *client*? **YES**

(b) Does the custodian send quarterly statements to your *clients* showing all disbursements for the custodian account, including the amount of the advisory fees? **YES**

(c) Do your *clients* provide written authorization permitting you to be paid directly for their accounts held by the custodian or trustee? **YES**

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800-985-7851 (Toll-Free)
A Registered Investment Advisor with the states of California and Michigan

Item 16 – Investment Discretion

Discretionary Management

We receive discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. Such authority is provided in our contract with each client. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the client account. Client investment guidelines may or may not limit the scope of potential investments. As a result, clients can impose restrictions on investing in certain securities or types of securities. When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions of the client. Investment guidelines and restrictions must be provided to us in writing.

Wrap Account Management

We do not participate in wrap account management programs.

Item 17 – Voting Client Securities

It is our policy to vote proxies for all accounts for which we have voting authority in a way we believe to be in the best interests of our clients. We recognize that in some instances, the interests of corporate management may not be consistent with what we view to be in the best interests of *The Foundations* clients. Therefore, in the absence of written voting instructions from a client, we have adopted the following voting guidelines.

1. Confidential Voting and Shareholder Actions: We believe that the proxy voting systems should provide access to both management and shareholders. As such, we would tend to vote in favor of shareholder resolutions requesting that corporations adopt policies that comprise both confidential voting and the use of independent inspectors of elections. We would also generally oppose any measures that would restrict the right of shareholders to act by written consent or to call a special meeting of the shareholders.

2. Poison Pills and Golden Parachutes: We believe that the shareholders of a corporation should have the right to vote upon decisions in which there is a real or potential conflict between the interests of shareholders and those of management. Thus, we will vote in favor of shareholder proposals requesting that a corporation submit a "poison pill" for shareholder ratification. We will examine, on a case-by-case basis, shareholder proposals to redeem a "poison pill" and management proposals to ratify a "poison pill." We will also vote in favor of proposals that "golden parachute" proposals be submitted for shareholder approval.

3. Election of Directors: We believe that one of the primary rights of a shareholder is the right to vote for the election of directors. Each director standing for election will be evaluated as to their desirability in providing proper corporate governance. We will favor situations where outside directors form a super-majority of the board.

4. Voting Rights: We believe that each shareholder should have equal voting rights. We will, in most instances, vote against dual class voting and other unequal voting structures.

5. Fair Price Amendments: We believe that "fair price amendments" can protect shareholders from coercive and discriminatory tender offers. We will generally vote in favor of fair price provisions and in favor of other measures which we feel will protect shareholders from coercive takeover bids which do not provide for fair and equal treatment of all shareholders.

6. Target Share Payments: We believe that shareholders should have the right to vote on the placement of blocks of a corporation's stock in the hands of persons friendly to management. We will vote in favor of shareholder proposals which request that corporations first obtain shareholder authorization before issuing any significant amount of voting stock (whether common or preferred), rights, warrants or securities convertible into voting stock to any person or group. We believe that shareholders should have the right to vote on placements that could enable management of a corporation to defeat a tender offer that may be in the best interests of shareholders.

7. Tender Offers: We will consider tender offers on a case-by-case basis.

8. Other Issues: Notwithstanding the above guidelines, we will vote proxies in a manner we believe is in the best interest of our clients.

We recognize that proxy proposals may present a conflict between the interests of clients and those of the Firm. Therefore, we have adopted the following conflict procedures.

1. Identifying Conflicts: The person assigned responsibility for voting proxies shall, when reviewing proxy materials, identify conflicts of interest including, for example, when we:

a. is managing, or are seeking to manage, a pension plan or provide other services to a company whose management is soliciting proxies or;

b. has business or personal relationships with participants in proxy contests, corporate directors or candidates for directorships.

2. Data for Identifying Conflicts: The person assigned responsibility for voting proxies shall advise management of companies soliciting proxies, and management shall advise if there are any known conflicts – including the conflicts listed as examples in the preceding paragraph.

3. Disclose Conflicts: If a conflict is identified, the person assigned to vote proxies shall notify management as soon as possible so that a decision will be made in adequate time to vote the proxy in a timely manner.

4. Voting Decisions in Conflict Situations: If the matter to be voted on is covered above, the proxy shall be voted in accordance with the above-referenced procedures. If the matter is not specifically addressed by the above-referenced procedures and there is a conflict, management shall contact the client or client's designated representative for voting instructions.

5. Record of Voting Instructions: Management shall record, and the person responsible for voting proxies shall maintain, records reflecting client voting instructions on matters where there are conflicts. If you would like to know how we voted any proxy in your account, please contact our

office and the information will be provided. You may also request a complete copy of our written proxy voting procedures by contacting us.

Item 18 – Financial Information

The Foundation does not have any financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has never been the subject of a bankruptcy proceeding. In addition, we do not require or solicit pre-payment of advisory fees for more than $1,200 per client, six months or more in advance, and more than $500 per client, six months or more in advance in California.

Item 19 – Requirements for State – Registered Advisers

• Information regarding the formal education and business background for Church Organizers Foundation principal officers and management persons can be found in Part 2B.

• Church Organizers Foundation is not engaged in any other business as described in Part 2A, Item 10.

• Church Organizers Foundation does not accept performance-based fees as stated in Part 2A, Item 6.

• Neither Church Organizers Foundation principal officers, nor any of its management persons, have been involved in any arbitration claims or proceedings, as stated in Part 2B.

• Church Organizers Foundation has no affiliations with any issuers of securities as stated in Part 2A, Item 10.

Additional Disclosures

1. There are no material conflicts of interest to disclose.
2. The Foundation provides assurance the firm maintains a Business Continuity Plan (BCP) identifying procedures relating to an emergency or significant business disruption, including death or incapacitation of the investment advisor or any of its representatives.

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Brochure Supplement – Part 2B of Form ADV

Supervised Persons

Martin E. Lee (CRD 4024387)

This Brochure Supplement provides information about Martin L. Lee that supplements The Church Organizers Foundation Form ADV Part 2A Brochure. You should have received a copy of that brochure. Please contact Church Organizers Foundation, if you did if you did not receive the Church Organizers Foundation Brochure or if you have any questions about the contents of this supplement.

Additional information about Martin L. Lee is available on the SEC's website at www.adviserinfo.sec.gov.

Brochure supplement prepared on December 1, 2019

Item 1 – Martin E. Lee, Executive Director – Chief Investment Officer

Date of Birth: 10/14/1969

Item 1 – Professional Licenses

- FINRA Securities License – Series 7 (1999)
- FINRA Securities License – Series 24 (2003)
- FINRA Securities License – Series 63 (1999)
- FINRA Securities License – Series 65 (1999)

Item 2 – Educational Background & Business Experience

Educational Background

CONCORDIA SEMINARY St. Louis, Missouri
D.MIN. (expected May 2020)

Missional Leadership
Major Applied Project: *Organizational Stewardship: A Study of Stewardship Knowledge and Practice in Two LC–MS Churches with Elementary Schools*
Department Chair: Dr. Mark Rochenbach

CONCORDIA THEOLOGICAL SEMINARY Ft. Wayne, Indiana
M.DIV. May 1997

Department of Practical Theology

Thesis: *Integrating Liturgy and Principles of Community Building*

CONCORDIA UNIVERSITY Ann Arbor, Michigan
B.A. May 1992

Communications and **Classical Languages** (Greek, Hebrew, Latin)

Business Experience

- Financial Advisor – 1999 to Present
  - UBS PaineWebber, Riverside, CA (September 1999 to September 2002)
  - LPL Financial, Riverside, CA & Mason, MI (October 2002 to October 2007; December 2013 to June 2016)
  - Sigma Financial Corp, Mason, MI (October 2007 to December 2009)
  - Trustmont Financial Group, Mason, MI (February 2010 to December 2013)
  - Church Organizers Foundation, Mason, MI (June 2016 – Present)
- Pastor – 1997 to Present
  - Settled Parish Pastor & Worker Priest (August 1997 to September 2008)
    1. Sole Pastor/Worker Priest – *Trinity Lutheran Church, Montclair, CA*. AWA: 50; Annual Budget: $75K. (August 1997 – October 2000)
    2. Sole Pastor/Worker Priest – *Trinity Lutheran Church, San Bernardino, CA*. AWA: 50; Annual Budget: $80K. (October 2000 – November 2006)
  - Credentialed Intentional Interim Pastor (October 2008 to Present)
    1. Intentional Interim Pastor Training – *Grace Lutheran, Leslie, MI*. AWA: 50; Annual Budget: $80K; Employees: 9, (December 2008 – October 2010).
    2. Intentional Interim Pastor – *St. Mark Lutheran Church & School, Battle Creek, MI*. AWA: 250; Students: 200; Annual Budget: $1.3 Million; Employees: 75, (October 2010 – November 2012).
    3. Intentional Interim Pastor – *St. Mark Lutheran Church & School, Kentwood, MI*. AWA: 250; Students: 95; Annual Budget: $1.1 Million; Employees: 20, (November 2012 – February 2014).
    4. Intentional Interim Pastor – *St. Paul Lutheran Church & School, Glen Burnie, MD*. AWA: 350; Annual Budget: $3.6 Million; Employees: 80, (July 2014 – November 2015).
    5. Intentional Interim Pastor – *St. Matthew Lutheran Church & School, Westland, MI*. AWA: 250; Annual Budget: $1.1 Million; Students: 109; Employees: 18, (January 2016 to December 2016).
    6. Intentional Interim Pastor – *St. John's Lutheran Church, St. John, MI*. AWA: 125; Annual Budget: $200K; Employees: 5, (June 2017 – November 2019).

7. Intentional Interim Pastor – *Ascension Lutheran Church, Pittsburgh, PA*. AWA: 95; Annual Budget: $125K; Employees: 3, (December 9, 2018 to December 24, 2019).

Martin is 50 years old. He worked in investment management at UBS PaineWebber where he was trained and managed over $40 million in assets primarily private client accounts, foundations and endowments. Today he serves as a church consultant (intentional interim pastor) specializing in church and school finance, operations, staffing, and governance. He is an honors student Concordia Seminary in St. Louis, Missouri will complete a Doctor of Ministry degree in Missional Leadership with a focus in Organizational Theory and Organizational Stewardship. In conjunction with his role as a specialized intentional interim pastor, Martin has worked in the securities industry for 20 years giving advice to nonprofits and private clients.

Item 3 – Disciplinary Information

Martin Lee has never been part of any disciplinary action and therefore has no disciplinary information to report.

If the supervised person (Martin Lee) has been involved in one of the events listed below, disclose all material facts regarding the event:

A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the *supervised person*

1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any *felony*; (b) a *misdemeanor* that *involved* investments or an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses; **NONE**
2. is the named subject of a pending criminal *proceeding* that involves an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses; **NONE**
3. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation; or **NONE**
4. was the subject of any *order*, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the *supervised person* from engaging in any *investment-related* activity, or from violating any *investment-related* statute, rule, or *order*. **NONE**

B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which the *supervised person*

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; **NONE** or
2. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority NONE
   (a) denying, suspending, or revoking the authorization of the *supervised person* to act in an *investment-related* business; **NONE**
   (b) barring or suspending the *supervised person's* association with an *investment-related* business; **NONE**
   (c) otherwise significantly limiting the *supervised person's investment-related* activities; **NONE** or
   (d) imposing a civil money penalty of more than $2,500 on the *supervised person*. **NONE**

C. A *self-regulatory organization* (*SRO*) *proceeding* in which the *supervised person*

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; **NONE** or
2. was *found* to have been *involved* in a violation of the *SRO's* rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from *investment-related* activities; or (iii) fined more than $2,500. **NONE**

D. Any other hearing or formal adjudication in which a professional attainment, designation, or license of the *supervised person* was revoked or suspended because of a violation of rules relating to professional conduct. If the *supervised person* resigned (or otherwise relinquished the attainment, designation, or license) in anticipation of such a hearing or formal adjudication (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event. **NONE**

Item 4 – Other Business Activity

Describe any business in which they are actively engaged (other than giving investment advice), and the approximate amount of time spent on that business: Martin E. Lee actively provides church consulting and educational services and spends 50% of his time on this activity.

Item 5 – Additional Compensation

If you are compensated for advisory services with performance-based fees, explain how these fees will be calculated: Martin E. Lee is not compensated with performance-based fees. Martin E. Lee is compensated for providing intentional interim ministry consulting services to churches in transition; that is between pastors, launching new ministries, or seeking guidance in new endeavors. He is paid a part-time salary in alignment with the Michigan District of the Lutheran Church Missouri Synod (LCMS).

Item 6 – Supervision

Martin E. Lee is the Executive Director – Chief Investment Officer of the Church Organizers Foundation; therefore, he is responsible for his own supervision. Martin monitors and reviews all customer correspondences, recommendations, and trades daily; while monitoring customer portfolio allocations alignment with each customer's profile on a monthly basis. Please call 800-985-7851 to discuss any concerns related to the supervised person.

Item 7 – Requirements for State Registered Advisers

A) Martin E. Lee has never been part of any of the following events listed below:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following: (a) an investment or an investment-

related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices. **NONE**

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following: (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices. **NONE**

B) Martin E. Lee has never been the subject of a bankruptcy petition.