STATEMENT OF DISCLOSURE EVANGELICAL FREE CHURCH OF AMERICA FOUNDATION CHARITABLE GIFT ANNUITY PROGRAM

The Evangelical Free Church of America (EFCA) generally invests the assets it receives under charitable gift annuity agreements (CGAs) in a common investment fund (fund). Certain states, however, require that the EFCA segregate all or part of the assets it receives under CGAs for residents of their states in separate accounts (state accounts), each of which also constitutes a common investment fund. Only assets received under EFCA CGAs are invested in the fund and state accounts.

The net assets of the fund and state accounts are designated by the EFCA Board of Directors for exclusive use by the CGA program. The fund and state accounts are not held in trust. EFCA CGAs are backed by the full assets of the EFCA and are not insured or otherwise guaranteed by any government entity.

The EFCA maintains custodial agreements through Syntrinsic Investment Counsel of Denver, CO for the fund and state accounts and pays Syntrinsic fees for its services. The EFCA, however, has ultimate control over the fund and state accounts. The EFCA Board of Directors approves investment policies for the fund and state accounts and has established an Investment Committee responsible to oversee and ensure compliance with these policies. The fund and state accounts are invested in diversified portfolios of equities and fixed income investments based on the asset allocation models in their respective investment policies. At December 31, 2015, total invested funds for CGAs were \$4,529,775. We have sufficient reserves to honor all CGA agreements.

Common investment funds (i.e. the fund) managed by the EFCA are exempt from registration requirements of the federal securities laws, pursuant to the exemption for collective investment funds and similar funds maintained by charitable organizations under the Philanthropy Protection Act of 1995. Certain states, however, require that the EFCA annually report to them the asset balances, actuarial liabilities and net assets held with respect to CGAs for residents of their states (i.e. the state accounts).

Because payments under EFCA CGAs are general, unsecured obligations of the EFCA and do not depend on investment performance of the fund and state accounts, investment reports will not normally be sent to donors who create EFCA CGAs. However, the EFCA will send each EFCA CGA annuitant an annual IRS Form 1099-R.

For more information on this statement of disclosure, please contact:

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