Form **990-PF**

Department of the Treasury
Internal Revenue Service

Return of Private Foundation
or Section 4947(a)(1) Nonexempt Charitable Trust Treated as a Private Foundation

OMB No 1545-0052

2009

Note: The foundation may be able to use a copy of this return to satisfy state reporting requirements

For calendar year 2009, or tax year beginning Nov 1 **, 2009, and ending** Oct 31 , 2010

G Check all that apply: [ ] Initial return [ ] Initial Return of a former public charity [ ] Final return
[ ] Amended return [ ] Address change [ ] Name change

Use the IRS label. Otherwise, print or type. See Specific Instructions.

Name of foundation: BEN COHEN CHARITABLE TRUST

Number and street (or P O box number if mail is not delivered to street address) Room/suite: C/O GHP ADVISORS, PC PO BOX 5550

City or town: BURLINGTON State: VT ZIP code: 05402-5550

A Employer identification number: 03-0368595

B Telephone number (see the instructions): (802) 863-5099

C If exemption application is pending, check here ► [ ]

D 1 Foreign organizations, check here ► [ ]

2 Foreign organizations meeting the 85% test, check here and attach computation ► [ ]

E If private foundation status was terminated under section 507(b)(1)(A), check here ► [ ]

F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here ► [ ]

H Check type of organization: [X] Section 501(c)(3) exempt private foundation
[ ] Section 4947(a)(1) nonexempt charitable trust [ ] Other taxable private foundation

I Fair market value of all assets at end of year (from Part II, column (c), line 16) ► $ 3,296,542.

J Accounting method: [X] Cash [ ] Accrual
[ ] Other (specify)
(Part I, column (d) must be on cash basis)

Part I Analysis of Revenue and Expenses *(The total of amounts in columns (b), (c), and (d) may not necessarily equal the amounts in column (a) (see the instructions))*

		(a) Revenue and expenses per books	(b) Net investment income	(c) Adjusted net income	(d) Disbursements for charitable purposes (cash basis only)
REVENUE	1 Contributions, gifts, grants, etc, received (att sch)				
	2 Ck ► [X] if the foundn is not req to att Sch B				
	3 Interest on savings and temporary cash investments	9,568.	9,568.		
	4 Dividends and interest from securities	53,732.	53,732.		
	5a Gross rents				
	b Net rental income or (loss)				
	6a Net gain/(loss) from sale of assets not on line 10	16,184.			
	b Gross sales price for all assets on line 6a 341,003.				
	7 Capital gain net income (from Part IV, line 2)		16,184.		
	8 Net short-term capital gain				
	9 Income modifications				
	10a Gross sales less returns and allowances				
	b Less Cost of goods sold				
	c Gross profit/(loss) (att sch)				
	11 Other income (attach schedule) INCOME TAX REFUND	2,190.			
	12 **Total.** Add lines 1 through 11	81,674.	79,484.		
OPERATING AND ADMINISTRATIVE EXPENSES	13 Compensation of officers, directors, trustees, etc				
	14 Other employee salaries and wages				
	15 Pension plans, employee benefits				
	16a Legal fees (attach schedule)				
	b Accounting fees (attach sch) L-16b Stmt	7,767.	7,767.		
	c Other prof fees (attach sch)				
	17 Interest				
	18 Taxes (attach schedule)(see instr) FOREIGN TAXES ON	2,834.	2,834.		
	19 Depreciation (attach sch) and depletion				
	20 Occupancy				
	21 Travel, conferences, and meetings				
	22 Printing and publications				
	23 Other expenses (attach schedule) See Line 23 Stmt	12,185.	12,185.		
	24 **Total operating and administrative expenses.** Add lines 13 through 23	22,786.	22,786.		
	25 Contributions, gifts, grants paid	96,000.			96,000.
	26 **Total expenses and disbursements.** Add lines 24 and 25	118,786.	22,786.		96,000.
	27 Subtract line 26 from line 12:				
	a **Excess of revenue over expenses and disbursements**	-37,112.			
	b **Net investment income** (if negative, enter -0-)		56,698.		
	c **Adjusted net income** (if negative, enter -0-)				

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Part II | Balance Sheets Attached schedules and amounts in the description column should be for end-of-year amounts only (See instructions)

		Beginning of year	End of year	
		(a) Book Value	(b) Book Value	(c) Fair Market Value
ASSETS	1 Cash – non-interest-bearing	115,774.	140,192.	140,192.
	2 Savings and temporary cash investments	171,695.	224,928.	228,558.
	3 Accounts receivable ▶			
	Less: allowance for doubtful accounts ▶			
	4 Pledges receivable ▶			
	Less: allowance for doubtful accounts ▶			
	5 Grants receivable			
	6 Receivables due from officers, directors, trustees, and other disqualified persons (attach schedule) (see the instructions)			
	7 Other notes and loans receivable (attach sch) ▶			
	Less: allowance for doubtful accounts ▶			
	8 Inventories for sale or use			
	9 Prepaid expenses and deferred charges			
	10a Investments – U.S. and state government obligations (attach schedule) L-10a Stmt	446,313.	299,113.	326,920.
	b Investments – corporate stock (attach schedule) L-10b Stmt	2,528,702.	2,561,139.	2,600,872.
	c Investments – corporate bonds (attach schedule)			
	11 Investments – land, buildings, and equipment basis ▶			
	Less: accumulated depreciation (attach schedule) ▶			
	12 Investments – mortgage loans			
	13 Investments – other (attach schedule)			
	14 Land, buildings, and equipment basis ▶			
	Less accumulated depreciation (attach schedule) ▶			
	15 Other assets (describe ▶)			
	16 Total assets (to be completed by all filers – see instructions Also, see page 1, item I)	3,262,484.	3,225,372.	3,296,542.
LIABILITIES	17 Accounts payable and accrued expenses			
	18 Grants payable			
	19 Deferred revenue			
	20 Loans from officers, directors, trustees, & other disqualified persons			
	21 Mortgages and other notes payable (attach schedule)			
	22 Other liabilities (describe ▶)			
	23 **Total liabilities** (add lines 17 through 22)			
NET ASSETS OR FUND BALANCES	**Foundations that follow SFAS 117, check here ▶ ☐ and complete lines 24 through 26 and lines 30 and 31.**			
	24 Unrestricted			
	25 Temporarily restricted			
	26 Permanently restricted			
	Foundations that do not follow SFAS 117, check here ▶ [X] and complete lines 27 through 31.			
	27 Capital stock, trust principal, or current funds	2,115,857.	2,019,857.	
	28 Paid-in or capital surplus, or land, building, and equipment fund			
	29 Retained earnings, accumulated income, endowment, or other funds	1,146,627.	1,205,515.	
	30 **Total net assets or fund balances** (see the instructions)	3,262,484.	3,225,372.	
	31 **Total liabilities and net assets/fund balances** (see the instructions)	3,262,484.	3,225,372.	

Part III | Analysis of Changes in Net Assets or Fund Balances

1	Total net assets or fund balances at beginning of year – Part II, column (a), line 30 (must agree with end-of-year figure reported on prior year's return)	1	3,262,484.
2	Enter amount from Part I, line 27a	2	-37,112.
3	Other increases not included in line 2 (itemize) ▶	3	
4	Add lines 1, 2, and 3	4	3,225,372.
5	Decreases not included in line 2 (itemize) ▶	5	
6	Total net assets or fund balances at end of year (line 4 minus line 5) – Part II, column (b), line 30	6	3,225,372.

Part IV Capital Gains and Losses for Tax on Investment Income

	(a) List and describe the kind(s) of property sold (e.g , real estate, 2-story brick warehouse; or common stock, 200 shares MLC Company)	(b) How acquired P — Purchase D — Donation	(c) Date acquired (month, day, year)	(d) Date sold (month, day, year)
1a	FHLMC 4.375% 1/25/10	P	09/18/06	01/25/10
b	FHLMC 5% 9/1/10	P	09/18/06	09/01/10
c	VARIOUS-ST SECURITY SALES ACCT MC 2699 (ATTACHMENT 1)	P	11/01/09	10/31/10
d	VARIOUS-LT SECURITY SALES ACCT MC 2699 (ATTACHMENT 1)	P	11/01/00	10/31/10
e	See Columns (a) thru (d)			

	(e) Gross sales price	(f) Depreciation allowed (or allowable)	(g) Cost or other basis plus expense of sale	(h) Gain or (loss) (e) plus (f) minus (g)
a	50,000.		50,000.	0.
b	50,000.		49,950.	50.
c	9,927.		5,863.	4,064.
d	133,926.		137,887.	-3,961.
e	See Columns (e) thru (h)		80,979.	16,031.

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69

	(i) Fair Market Value as of 12/31/69	(j) Adjusted basis as of 12/31/69	(k) Excess of column (i) over column (j), if any	(l) Gains (Column (h) gain minus column (k), but not less than -0-) or Losses (from column (h))
a				0.
b				50.
c				4,064.
d				-3,961.
e	See Columns (i) thru (l)			16,031.

2 Capital gain net income or (net capital loss). If gain, also enter in Part I, line 7; If (loss), enter -0- in Part I, line 7 — 2 — 16,184.

3 Net short-term capital gain or (loss) as defined in sections 1222(5) and (6):

If gain, also enter in Part I, line 8, column (c) (see the instructions). If (loss), enter -0- in Part I, line 8 — 3

Part V Qualification Under Section 4940(e) for Reduced Tax on Net Investment Income

(For optional use by domestic private foundations subject to the section 4940(a) tax on net investment income)

If section 4940(d)(2) applies, leave this part blank

Was the foundation liable for the section 4942 tax on the distributable amount of any year in the base period? ☐ Yes ☒ No

If 'Yes,' the foundation does not qualify under section 4940(e) Do not complete this part.

1 Enter the appropriate amount in each column for each year; see the instructions before making any entries

(a) Base period years Calendar year (or tax year beginning in)	(b) Adjusted qualifying distributions	(c) Net value of noncharitable-use assets	(d) Distribution ratio (column (b) divided by column (c))
2008	210,000.	2,682,717.	0.078279
2007	230,643.	3,655,364.	0.063097
2006	287,107.	4,107,577.	0.069897
2005	65,000.	3,884,639.	0.016733
2004	0.	3,574,548.	0.000000

2	Total of line 1, column (d)	2	0.228006
3	Average distribution ratio for the 5-year base period — divide the total on line 2 by 5, or by the number of years the foundation has been in existence if less than 5 years	3	0.045601
4	Enter the net value of noncharitable-use assets for 2009 from Part X, line 5	4	2,977,266.
5	Multiply line 4 by line 3	5	135,766.
6	Enter 1% of net investment income (1% of Part I, line 27b)	6	567.
7	Add lines 5 and 6	7	136,333.
8	Enter qualifying distributions from Part XII, line 4	8	96,000.

If line 8 is equal to or greater than line 7, check the box in Part VI, line 1b, and complete that part using a 1% tax rate. See the Part VI instructions

Part VI Excise Tax Based on Investment Income (Section 4940(a), 4940(b), 4940(e), or 4948 – see the instructions)

1 a Exempt operating foundations described in section 4940(d)(2), check here ► ☐ and enter 'N/A' on line 1. Date of ruling or determination letter. ________ (attach copy of letter if necessary - see instr.)				
b Domestic foundations that meet the section 4940(e) requirements in Part V, check here ► ☐ and enter 1% of Part I, line 27b			1	1,134.
c All other domestic foundations enter 2% of line 27b. Exempt foreign organizations enter 4% of Part I, line 12, column (b)				
2 Tax under section 511 (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter -0-)			2	0.
3 Add lines 1 and 2			3	1,134.
4 Subtitle A (income) tax (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter -0-)			4	0.
5 **Tax based on investment income.** Subtract line 4 from line 3. If zero or less, enter -0-			5	1,134.
6 Credits/Payments.				
a 2009 estimated tax pmts and 2008 overpayment credited to 2009	6a	1,000.		
b Exempt foreign organizations – tax withheld at source	6b			
c Tax paid with application for extension of time to file (Form 8868)	6c			
d Backup withholding erroneously withheld	6d			
7 Total credits and payments. Add lines 6a through 6d			7	1,000.
8 Enter any **penalty** for underpayment of estimated tax. Check here ☐ if Form 2220 is attached			8	
9 **Tax due.** If the total of lines 5 and 8 is more than line 7, enter **amount owed** ►			9	134.
10 **Overpayment.** If line 7 is more than the total of lines 5 and 8, enter the **amount overpaid** ►			10	0.
11 Enter the amount of line 10 to be: **Credited to 2010 estimated tax** ►	0.	**Refunded** ►	11	

Part VII-A Statements Regarding Activities

		Yes	No
1 a During the tax year, did the foundation attempt to influence any national, state, or local legislation or did it participate or intervene in any political campaign?	1a		X
b Did it spend more than $100 during the year (either directly or indirectly) for political purposes (see the instructions for definition)?	1b		X
If the answer is 'Yes' to 1a or 1b, attach a detailed description of the activities and copies of any materials published or distributed by the foundation in connection with the activities			
c Did the foundation file **Form 1120-POL** for this year?	1c		X
d Enter the amount (if any) of tax on political expenditures (section 4955) imposed during the year. **(1)** On the foundation ► $ ______ **(2)** On foundation managers ► $ ______			
e Enter the reimbursement (if any) paid by the foundation during the year for political expenditure tax imposed on foundation managers ► $ ______			
2 Has the foundation engaged in any activities that have not previously been reported to the IRS? *If 'Yes,' attach a detailed description of the activities.*	2		X
3 Has the foundation made any changes, not previously reported to the IRS, in its governing instrument, articles of incorporation, or bylaws, or other similar instruments? *If 'Yes,' attach a conformed copy of the changes*	3		X
4a Did the foundation have unrelated business gross income of $1,000 or more during the year?	4a		X
b If 'Yes,' has it filed a tax return on **Form 990-T** for this year?	4b		
5 Was there a liquidation, termination, dissolution, or substantial contraction during the year? *If 'Yes,' attach the statement required by General Instruction T*	5		X
6 Are the requirements of section 508(e) (relating to sections 4941 through 4945) satisfied either: • By language in the governing instrument, or • By state legislation that effectively amends the governing instrument so that no mandatory directions that conflict with the state law remain in the governing instrument?	6	X	
7 Did the foundation have at least $5,000 in assets at any time during the year? *If 'Yes,' complete Part II, column (c), and Part XV*	7	X	
8a Enter the states to which the foundation reports or with which it is registered (see the instructions) ► VT - Vermont			
b If the answer is 'Yes' to line 7, has the foundation furnished a copy of Form 990-PF to the Attorney General (or designate) of each state as required by *General Instruction G? If 'No,' attach explanation*	8b	X	
9 Is the foundation claiming status as a private operating foundation within the meaning of section 4942(j)(3) or 4942(j)(5) for calendar year 2009 or the taxable year beginning in 2009 (see instructions for Part XIV)? *If 'Yes,' complete Part XIV*	9		X
10 Did any persons become substantial contributors during the tax year? *If 'Yes,' attach a schedule listing their names and addresses*	10		X

Part VII-A Statements Regarding Activities *Continued*

			Yes	No
11	At any time during the year, did the foundation, directly or indirectly, own a controlled entity within the meaning of section 512(b)(13)? If 'Yes', attach schedule (see instructions)	11		X
12	Did the foundation acquire a direct or indirect interest in any applicable insurance contract before August 17, 2008?	12		X
13	Did the foundation comply with the public inspection requirements for its annual returns and exemption application?	13	X	

Website address ► N/A

14 The books are in care of ► GHP ADVISORS, PC Telephone no ► (802) 863-5099

Located at ► 131 MAIN STREET, 8th FLOOR, BURLINGTON, VT ZIP + 4 ► 05401

15 Section 4947(a)(1) nonexempt charitable trusts filing Form 990-PF in lieu of **Form 1041** – Check here ► ☐

and enter the amount of tax-exempt interest received or accrued during the year ► 15

Part VII-B Statements Regarding Activities for Which Form 4720 May Be Required

File Form 4720 if any item is checked in the 'Yes' column, unless an exception applies.

				Yes	No
1 a	During the year did the foundation (either directly or indirectly):				
	(1) Engage in the sale or exchange, or leasing of property with a disqualified person?	☐ Yes ☒ No			
	(2) Borrow money from, lend money to, or otherwise extend credit to (or accept it from) a disqualified person?	☐ Yes ☒ No			
	(3) Furnish goods, services, or facilities to (or accept them from) a disqualified person?	☐ Yes ☒ No			
	(4) Pay compensation to, or pay or reimburse the expenses of, a disqualified person?	☐ Yes ☒ No			
	(5) Transfer any income or assets to a disqualified person (or make any of either available for the benefit or use of a disqualified person)?	☐ Yes ☒ No			
	(6) Agree to pay money or property to a government official? (**Exception.** Check 'No' if the foundation agreed to make a grant to or to employ the official for a period after termination of government service, if terminating within 90 days.)	☐ Yes ☒ No			
b	If any answer is 'Yes' to 1a(1)-(6), did **any** of the acts fail to qualify under the exceptions described in Regulations section 53.4941(d)-3 or in a current notice regarding disaster assistance (see the instructions)?		1b		
	Organizations relying on a current notice regarding disaster assistance check here	► ☐			
c	Did the foundation engage in a prior year in any of the acts described in 1a, other than excepted acts, that were not corrected before the first day of the tax year beginning in 2009?		1c		X
2	Taxes on failure to distribute income (section 4942) (does not apply for years the foundation was a private operating foundation defined in section 4942(j)(3) or 4942(j)(5))				
a	At the end of tax year 2009, did the foundation have any undistributed income (lines 6d and 6e, Part XIII) for tax year(s) beginning before 2009?	☐ Yes ☒ No			
	If 'Yes,' list the years ► 20__ , 20__ , 20__ , 20__ .				
b	Are there any years listed in 2a for which the foundation is **not** applying the provisions of section 4942(a)(2) (relating to incorrect valuation of assets) to the year's undistributed income? (If applying section 4942(a)(2) to **all** years listed, answer 'No' and attach statement – see the instructions.)		2b		
c	If the provisions of section 4942(a)(2) are being applied to **any** of the years listed in 2a, list the years here. ► 20__ , 20__ , 20__ , 20__ .				
3 a	Did the foundation hold more than a 2% direct or indirect interest in any business enterprise at any time during the year?	☐ Yes ☒ No			
b	If 'Yes,' did it have excess business holdings in 2009 as a result of **(1)** any purchase by the foundation or disqualified persons after May 26, 1969, **(2)** the lapse of the 5-year period (or longer period approved by the Commissioner under section 4943(c)(7)) to dispose of holdings acquired by gift or bequest; or **(3)** the lapse of the 10-, 15-, or 20-year first phase holding period? *(Use Schedule C, Form 4720, to determine if the foundation had excess business holdings in 2009.)*		3b		
4 a	Did the foundation invest during the year any amount in a manner that would jeopardize its charitable purposes?		4a		X
b	Did the foundation make any investment in a prior year (but after December 31, 1969) that could jeopardize its charitable purpose that had not been removed from jeopardy before the first day of the tax year beginning in 2009?		4b		X

Part VII-B Statements Regarding Activities for Which Form 4720 May Be Required *(continued)*

5a During the year did the foundation pay or incur any amount to				
(1) Carry on propaganda, or otherwise attempt to influence legislation (section 4945(e))?	☐ Yes ☒ No			
(2) Influence the outcome of any specific public election (see section 4955); or to carry on, directly or indirectly, any voter registration drive?	☐ Yes ☒ No			
(3) Provide a grant to an individual for travel, study, or other similar purposes?	☐ Yes ☒ No			
(4) Provide a grant to an organization other than a charitable, etc, organization described in section 509(a)(1), (2), or (3), or section 4940(d)(2)? (see instructions)	☐ Yes ☒ No			
(5) Provide for any purpose other than religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals?	☐ Yes ☒ No			
b If any answer is 'Yes' to 5a(1)-(5), did **any** of the transactions fail to qualify under the exceptions described in Regulations section 53 4945 or in a current notice regarding disaster assistance (see instructions)?		5b		
Organizations relying on a current notice regarding disaster assistance check here	► ☐			
c If the answer is 'Yes' to question 5a(4), does the foundation claim exemption from the tax because it maintained expenditure responsibility for the grant?	☐ Yes ☐ No			
If 'Yes,' attach the statement required by Regulations section 53.4945-5(d).				
6a Did the foundation, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	☐ Yes ☒ No			
b Did the foundation, during the year, pay premiums, directly or indirectly, on a personal benefit contract?		6b		X
If 'Yes' to 6b, file Form 8870.				
7a At any time during the tax year, was the foundation a party to a prohibited tax shelter transaction?	☐ Yes ☒ No			
b If yes, did the foundation receive any proceeds or have any net income attributable to the transaction?		7b		

Part VIII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors

1 List all officers, directors, trustees, foundation managers and their compensation (see instructions).

(a) Name and address	(b) Title and average hours per week devoted to position	(c) Compensation (If not paid, enter -0-)	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
BENNETT R. COHEN C/O GHP ADVISORS, PC PO BOX 5550, BURLINGTON, VT 05402	TRUSTEE 2.50	0.	0.	0.

2 Compensation of five highest-paid employees (other than those included on line 1— see instructions). If none, enter 'NONE.'

(a) Name and address of each employee paid more than $50,000	(b) Title and average hours per week devoted to position	(c) Compensation	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
NONE				
0				
0				
0				
0				

Total number of other employees paid over $50,000 ► None

Part VIII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors *(continued)*

3 Five highest-paid independent contractors for professional services – (see instructions). If none, enter 'NONE.'

(a) Name and address of each person paid more than $50,000	(b) Type of service	(c) Compensation
NONE	N/A	
Total number of others receiving over $50,000 for professional services		None

Part IX-A Summary of Direct Charitable Activities

List the foundation's four largest direct charitable activities during the tax year Include relevant statistical information such as the number of organizations and other beneficiaries served, conferences convened, research papers produced, etc.	Expenses
1	
2	
3	
4	

Part IX-B Summary of Program-Related Investments (see instructions)

Describe the two largest program-related investments made by the foundation during the tax year on lines 1 and 2	Amount
1	
2	
All other program-related investments See instructions.	
3	
Total. Add lines 1 through 3	

Part X Minimum Investment Return (All domestic foundations must complete this part. Foreign foundations, see instructions.)

1	Fair market value of assets not used (or held for use) directly in carrying out charitable, etc, purposes		
a	Average monthly fair market value of securities	1a	2,706,267.
b	Average of monthly cash balances	1b	316,338.
c	Fair market value of all other assets (see instructions)	1c	
d	**Total** (add lines 1a, b, and c)	1d	3,022,605.
e	Reduction claimed for blockage or other factors reported on lines 1a and 1c (attach detailed explanation) 1e		
2	Acquisition indebtedness applicable to line 1 assets	2	
3	Subtract line 2 from line 1d	3	3,022,605.
4	Cash deemed held for charitable activities. Enter 1-1/2% of line 3 (for greater amount, see instructions)	4	45,339.
5	**Net value of noncharitable-use assets.** Subtract line 4 from line 3. Enter here and on Part V, line 4	5	2,977,266.
6	**Minimum investment return.** Enter 5% of line 5	6	148,863.

Part XI Distributable Amount (see instructions) (Section 4942(j)(3) and (j)(5) private operating foundations and certain foreign organizations check here ► ☐ and do not complete this part.)

1	Minimum investment return from Part X, line 6			1	148,863.
2a	Tax on investment income for 2009 from Part VI, line 5	2a	1,134.		
b	Income tax for 2009 (This does not include the tax from Part VI)	2b			
c	Add lines 2a and 2b			2c	1,134.
3	Distributable amount before adjustments Subtract line 2c from line 1			3	147,729.
4	Recoveries of amounts treated as qualifying distributions			4	
5	Add lines 3 and 4			5	147,729.
6	Deduction from distributable amount (see instructions)			6	
7	**Distributable amount** as adjusted. Subtract line 6 from line 5. Enter here and on Part XIII, line 1			7	147,729.

Part XII Qualifying Distributions (see instructions)

1	Amounts paid (including administrative expenses) to accomplish charitable, etc, purposes		
a	Expenses, contributions, gifts, etc– total from Part I, column (d), line 26	1a	96,000.
b	Program-related investments – total from Part IX-B	1b	
2	Amounts paid to acquire assets used (or held for use) directly in carrying out charitable, etc, purposes	2	
3	Amounts set aside for specific charitable projects that satisfy the:		
a	Suitability test (prior IRS approval required)	3a	
b	Cash distribution test (attach the required schedule)	3b	
4	**Qualifying distributions** Add lines 1a through 3b. Enter here and on Part V, line 8, and Part XIII, line 4	4	96,000.
5	Foundations that qualify under section 4940(e) for the reduced rate of tax on net investment income Enter 1% of Part I, line 27b (see instructions)	5	0.
6	**Adjusted qualifying distributions.** Subtract line 5 from line 4	6	96,000.

Note: The amount on line 6 will be used in Part V, column (b), in subsequent years when calculating whether the foundation qualifies for the section 4940(e) reduction of tax in those years

Part XIII **Undistributed Income** (see instructions)

		(a) Corpus	(b) Years prior to 2008	(c) 2008	(d) 2009
1 Distributable amount for 2009 from Part XI, line 7					147,729.
2 Undistributed income, if any, as of the end of 2009.					
a Enter amount for 2008 only				0.	
b Total for prior years: 20___, 20___, 20___					
3 Excess distributions carryover, if any, to 2009:					
a From 2004	0.				
b From 2005	0.				
c From 2006	0.				
d From 2007	156,734.				
e From 2008	210,000.				
f **Total** of lines 3a through e		366,734.			
4 Qualifying distributions for 2009 from Part XII, line 4: ► $ 96,000.					
a Applied to 2008, but not more than line 2a					
b Applied to undistributed income of prior years (Election required — see instructions)					
c Treated as distributions out of corpus (Election required — see instructions)					
d Applied to 2009 distributable amount					
e Remaining amount distributed out of corpus		96,000.			
5 Excess distributions carryover applied to 2009. *(If an amount appears in column (d), the same amount must be shown in column (a).)*		147,729.			147,729.
6 **Enter the net total of each column as indicated below:**					
a Corpus. Add lines 3f, 4c, and 4e. Subtract line 5		315,005.			
b Prior years' undistributed income. Subtract line 4b from line 2b			0.		
c Enter the amount of prior years' undistributed income for which a notice of deficiency has been issued, or on which the section 4942(a) tax has been previously assessed					
d Subtract line 6c from line 6b Taxable amount — see instructions			0.		
e Undistributed income for 2008. Subtract line 4a from line 2a. Taxable amount — see instructions				0.	
f Undistributed income for 2009. Subtract lines 4d and 5 from line 1. This amount must be distributed in 2010					0.
7 Amounts treated as distributions out of corpus to satisfy requirements imposed by section 170(b)(1)(F) or 4942(g)(3) (see instructions)					
8 Excess distributions carryover from 2004 not applied on line 5 or line 7 (see instructions)		0.			
9 **Excess distributions carryover to 2010.** Subtract lines 7 and 8 from line 6a		315,005.			
10 Analysis of line 9					
a Excess from 2005	0.				
b Excess from 2006	0.				
c Excess from 2007	9,005.				
d Excess from 2008	210,000.				
e Excess from 2009	96,000.				

Part XIV Private Operating Foundations (see instructions and Part VII-A, question 9) N/A

1 a If the foundation has received a ruling or determination letter that it is a private operating foundation, and the ruling is effective for 2009, enter the date of the ruling ▶

b Check box to indicate whether the foundation is a private operating foundation described in section ☐ 4942(j)(3) or ☐ 4942(j)(5)

	Tax year	Prior 3 years			
	(a) 2009	(b) 2008	(c) 2007	(d) 2006	(e) Total
2 a Enter the lesser of the adjusted net income from Part I or the minimum investment return from Part X for each year listed					
b 85% of line 2a					
c Qualifying distributions from Part XII, line 4 for each year listed					
d Amounts included in line 2c not used directly for active conduct of exempt activities					
e Qualifying distributions made directly for active conduct of exempt activities Subtract line 2d from line 2c					
3 Complete 3a, b, or c for the alternative test relied upon.					
a 'Assets' alternative test – enter.					
(1) Value of all assets					
(2) Value of assets qualifying under section 4942(j)(3)(B)(i)					
b 'Endowment' alternative test – enter 2/3 of minimum investment return shown in Part X, line 6 for each year listed					
c 'Support' alternative test – enter:					
(1) Total support other than gross investment income (interest, dividends, rents, payments on securities loans (section 512(a)(5)), or royalties)					
(2) Support from general public and 5 or more exempt organizations as provided in section 4942(j)(3)(B)(iii)					
(3) Largest amount of support from an exempt organization					
(4) Gross investment income					

Part XV Supplementary Information (Complete this part only if the organization had $5,000 or more in assets at any time during the year – see instructions.)

1 Information Regarding Foundation Managers:

a List any managers of the foundation who have contributed more than 2% of the total contributions received by the foundation before the close of any tax year (but only if they have contributed more than $5,000). (See section 507(d)(2))

BEN COHEN

b List any managers of the foundation who own 10% or more of the stock of a corporation (or an equally large portion of the ownership of a partnership or other entity) of which the foundation has a 10% or greater interest.

NONE

2 Information Regarding Contribution, Grant, Gift, Loan, Scholarship, etc, Programs:

Check here ▶ ☐ if the foundation only makes contributions to preselected charitable organizations and does not accept unsolicited requests for funds. If the foundation makes gifts, grants, etc, (see instructions) to individuals or organizations under other conditions, complete items 2a, b, c, and d

a The name, address, and telephone number of the person to whom applications should be addressed:

BEN COHEN
191 BANK STREET
BURLINGTON VT 05401 (802) 651-9600

b The form in which applications should be submitted and information and materials they should include:

SEE ATTACHED

c Any submission deadlines:

SEE ATTACHED

d Any restrictions or limitations on awards, such as by geographical areas, charitable fields, kinds of institutions, or other factors

SEE ATTACHED

Part XV Supplementary Information (continued)

3 Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient Name and address (home or business)	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
a *Paid during the year*				
COMMONWEALTH FOUNDATION 225 STATE ST, SUITE 302 HARRISBURG PA 17101	N/A	PUBLIC	UNRESTRICTED	66,000.
NATIONAL PRIORITIES PROJECT 243 KING ST, SUITE 109 NORTHAMPTON MA 01060	N/A	PUBLIC	UNRESTRICTED	30,000.
Total ► 3a				96,000.
b *Approved for future payment*				
Total ► 3b				

Part XVI-A Analysis of Income-Producing Activities

Enter gross amounts unless otherwise indicated	Unrelated business income		Excluded by section 512, 513, or 514		(e) Related or exempt function income (see the instructions)
	(a) Business code	(b) Amount	(c) Exclusion code	(d) Amount	
1 Program service revenue:					
a					
b					
c					
d					
e					
f					
g Fees and contracts from government agencies					
2 Membership dues and assessments					
3 Interest on savings and temporary cash investments			14	9,568.	
4 Dividends and interest from securities			14	53,732.	
5 Net rental income or (loss) from real estate:					
a Debt-financed property					
b Not debt-financed property					
6 Net rental income or (loss) from personal property					
7 Other investment income					
8 Gain or (loss) from sales of assets other than inventory			18	16,184.	
9 Net income or (loss) from special events					
10 Gross profit or (loss) from sales of inventory					
11 Other revenue:					
a					
b					
c					
d					
e					
12 Subtotal Add columns (b), (d), and (e)				79,484.	

13 **Total.** Add line 12, columns (b), (d), and (e) . . . 13 79,484.

(See worksheet in the instructions for line 13 to verify calculations.)

Part XVI-B Relationship of Activities to the Accomplishment of Exempt Purposes

Line No. ▼	Explain below how each activity for which income is reported in column (e) of Part XVI-A contributed importantly to the accomplishment of the foundation's exempt purposes (other than by providing funds for such purposes). (See the instructions.)

Part XVII Information Regarding Transfers To and Transactions and Relationships With Noncharitable Exempt Organizations

		Yes	No
1 Did the organization directly or indirectly engage in any of the following with any other organization described in section 501(c) of the Code (other than section 501(c)(3) organizations) or in section 527, relating to political organizations?			
a Transfers from the reporting foundation to a noncharitable exempt organization of.			
(1) Cash	1a(1)		X
(2) Other assets	1a(2)		X
b Other transactions:			
(1) Sales of assets to a noncharitable exempt organization	1b(1)		X
(2) Purchases of assets from a noncharitable exempt organization	1b(2)		X
(3) Rental of facilities, equipment, or other assets	1b(3)		X
(4) Reimbursement arrangements	1b(4)		X
(5) Loans or loan guarantees	1b(5)		X
(6) Performance of services or membership or fundraising solicitations	1b(6)		X
c Sharing of facilities, equipment, mailing lists, other assets, or paid employees	1c		X

d If the answer to any of the above is 'Yes,' complete the following schedule Column **(b)** should always show the fair market value of the goods, other assets, or services given by the reporting foundation. If the foundation received less than fair market value in any transaction or sharing arrangement, show in column **(d)** the value of the goods, other assets, or services received

(a) Line no.	(b) Amount involved	(c) Name of noncharitable exempt organization	(d) Description of transfers, transactions, and sharing arrangements

2a Is the foundation directly or indirectly affiliated with, or related to, one or more tax-exempt organizations described in section 501(c) of the Code (other than section 501(c)(3)) or in section 527? ☐ Yes ☒ No

b If 'Yes,' complete the following schedule.

(a) Name of organization	(b) Type of organization	(c) Description of relationship

SIGN HERE

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete Declaration of preparer (other than taxpayer or fiduciary) is based on all information of which preparer has any knowledge

► [signature] | 3-15-11 | ► PRESIDENT

Signature of officer or trustee | Date | Title

Paid Preparer's Use Only

Preparer's signature ► George H. [signature] CPA	Date 2/23/11	Check if self-employed ► ☐	Preparer's Identifying number (See **Signature** in the instrs) P00544968
Firm's name (or yours if self-employed), address, and ZIP code ► GHP ADVISORS PC, 131 MAIN STREET, 8TH FLOOR, BURLINGTON VT 05401		EIN ► 03-0322884	
		Phone no ► (802) 863-5099	

Additional Information

PART VII-A, LINE 10 SUBSTANTIAL CONTRIBUTORS

SUBSTANTIAL CONTRIBUTOR: BEN COHEN

ADDRESS: C/O GHP ADVISORS, PC
PO BOX 5550
BURLINGTON, VT 05402-5550

AMOUNT: $7,504,622

NO CONTRIBUTIONS WERE MADE DURING TAX YEAR 2009

Additional Information

PART XV, LINE 2 b, c, d

THE BEN COHEN CHARITABLE TRUST DOES NOT HAVE A FORMAL APPLICATION OR FORM FOR APPLICANTS SEEKING GRANTS TO COMPLETE. THE ORGANIZATION DOES NOT LIMIT ITS CONSIDERATION OF APPLICANTS TO PRE-SELECTED CHARITIES OR LIMIT ITS AWARDS TO A SPECIFIC DOLLAR AMOUNT OR BY GEOGRAPHIC REGION. THE TRUST GIVES TO QUALIFIED CHARITABLE OR EDUCATIONAL ORGANIZATIONS THAT HAVE A DEMONSTRATED HISTORY OR INTENTION FOR INVOLVEMENT IN SOCIALLY RESPONSIBLE ISSUES. THERE ARE NO GRANT DEADLINES THAT EXIST. REQUESTS FOR GRANT FUNDS ARE REVIEWED BY THE TRUSTEE OF THE BEN COHEN CHARITABLE TRUST FOR PROPRIETY AND COMPATIBILITY WITH THE CHARITABLE PURPOSES SPECIFIED WITHIN THE TRUST INDENTURE.

Form 990-PF, Page 1, Part I, Line 23
Line 23 Stmt

Other expenses:	Rev/Exp Book	Net Inv Inc	Adj Net Inc	Charity Disb
Invesment portfolio mgmt fees	11,046.	11,046.		
TRUSTEE & EXECUTOR FEES	1,139.	1,139.		
Total	12,185.	12,185.		

Form 990-PF, Part IV, Capital Gains and Losses for Tax on Investment Income
Columns (a) thru (d)

(a) List and describe the kind(s) of property sold (e.g., real estate, 2-story brick warehouse; or common stock, 200 shares MLC Company)	**(b)** How acquired P-Purchase D-Donation	**(c)** Date acquired (month, day, year)	**(d)** Date sold (month, day, year)
VARIOUS-ST SECURITY SALES ACCT MC 7824 (ATTACHMENT 2)	P	11/01/09	10/31/10
VARIOUS-LT SECURITY SALES ACCT MC 7824 (ATTACHMENT 2)	P	11/01/00	10/31/10
XEROX CORP SEC. LITIGATION	P	11/01/00	10/31/10
CAPITAL GAIN DISTRIBUTIONS	P	11/01/09	10/31/10

Form 990-PF, Part IV, Capital Gains and Losses for Tax on Investment Income
Columns (e) thru (h)

(e) Gross sales price	**(f)** Depreciation allowed (or allowable)	**(g)** Cost or other basis plus expense of sale	**(h)** Gain or (loss) (e) plus (f) minus (g)
22,042.		24,506.	-2,464.
74,620.		56,473.	18,147.
208.		0.	208.
140.		0.	140.
Total		80,979.	16,031.

Form 990-PF, Part IV, Capital Gains and Losses for Tax on Investment Income
Columns (i) thru (l)

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69			**(l)** Gains (column (h) gain minus column (k), but not less than -0-) **or** losses (from column (h))
(i) Fair Market Value as of 12/31/69	**(j)** Adjusted basis as of 12/31/69	**(k)** Excess of column (i) over column (j), if any	
			-2,464.
			18,147.
			208.
			140.
Total			16,031.

Form 990-PF, Page 1, Part I
Line 16b - Accounting Fees

Name of Provider	Type of Service Provided	Amount Paid Per Books	Net Investment Income	Adjusted Net Income	Disbursements for Charitable Purposes
GHP ADVISORS, PC	TAX ADV/PREPARATION AND	7,767.			
Total		7,767.			

Form 990-PF, Page 2, Part II, Line 10a
L-10a Stmt

Line 10a - Investments - US and State Government Obligations:	End of Year State and Local Obligations Book Value	State and Local Obligations FMV	End of Year US Government Obligations Book Value	US Government Obligations FMV
MC 2698				
50,000 FHLB 5.625% 11/15/11			51,300.	52,750.
50,000 FFCB 5.230% 02/14/12			50,350.	53,141.
50,000 FFCB 5.350% 10/24/12			50,725.	54,766.
50,000 FHLMC SER MTN3 4 625% 04/04/13			48,575.	54,924.
50,000 FHLMC 4.250% 05/22/13			47,488.	54,677.
50,000 FNMA SER MTN 5.380% 10/02/13			50,675.	56,662.
Total			299,113.	326,920.

Form 990-PF, Page 2, Part II, Line 10b
L-10b Stmt

Line 10b - Investments - Corporate Stock:	End of Year Book Value	Fair Market Value
ARIEL GROWTH FD 9187.835	354,848.	406,010.
HARBOR SMALL CAP GROWTH FD 29966.569SH	327,841.	356,003.
NEUBERGER BERMAN SOCIALLY RESPONSIVE 29182.05SH	669,362.	693,074.
KROGER 460SH	9,391.	10,120.
SAFEWAY 550SH	11,328.	12,595.
SARA LEE 345SH	5,309.	4,944.
ELI LILLY 300SH	10,470.	10,560.
MERCK & CO 204SH	2,896.	7,407.
PFIZER INC 13244SH	28,048.	23,057.
BOSTON SCIENTIFIC 1224SH	18,554.	7,821.
TENET HEALTHCARE 600SH	6,723.	2,617.
LOWES 500SH	10,596.	10,670.
MASCO CORP 480SH	8,951.	5,117.
SUPERVALU INC 253SH	7,476.	2,730.
DELL 1030SH	18,709.	14,827.
MICROSOFT CORP 690SH	14,002.	18,399.
VERIZON COMMUNICATIONS 430SH	16,448.	13,966.
WESTERN DIGITAL 150SH	3,647.	4,802.
XEROX CORP 670SH	9,408.	7,838.
AT&T 493SH	11,397.	14,060.
INTEL 645SH	10,930.	12,932.

Form 990-PF, Page 2, Part II, Line 10b Continued
L-10b Stmt

Line 10b - Investments - Corporate Stock:	End of Year Book Value	End of Year Fair Market Value
MOTOROLA 1150SH	20,241.	9,384.
TEXAS INSTRUMENTS 670SH	12,685.	19,812.
CHEVRON 109SH	8,112.	9,003.
CHESAPEAKE ENERGY 490SH	10,772.	10,623.
VALERO ENERGY CORP 780SH	13,205.	14,001.
DOW CHEMICAL 610SH	15,853.	18,812.
BB&T CORP 180SH	4,147.	4,214.
BANK OF AMERICA 839SH	38,062.	9,606.
FIFTH THIRD BANCORP 370SH	13,282.	4,647.
KEYCORP 300SH	3,525.	2,460.
SUNTRUST BANKS 167SH	3,179.	4,177.
WELLS FARGO 354SH	22,675.	9,225.
MARSH & MCLENNAN 380SH	8,588.	9,492.
AMERICAN EXPRESS 200SH	3,986.	8,292.
CITI GROUP 2121SH	5,782.	8,845.
REGIONS FINL 440SH	2,825.	2,772.
SAINSBURY 650SH	3,057.	4,046.
AEGON NV-NY REG SHR 1046SH	17,562.	6,600.
ALCATEL-LUCENT SPONSORED ADR 1153SH	16,421.	4,010.
ASTRAZENECA GROUP 260SH	12,738.	13,120.
MORRISON SUPERMARKET 2850SH	9,817.	13,387.
BP PLC 980SH	7,508.	6,672.
BRASIL TELECOM SA-ADR 306SH	9,582.	6,747.
BRASIL TELECOM SA-ADR 173SG	2,893.	1,590.
CANON INC 190SH	5,578.	8,740.
DAIICHI SANKYO 190SH	3,455.	4,045.
DEUTSCHE TELEKOM 1530SH	25,069.	22,047.
ENI SPA ADR 300SH	14,167.	13,479.
ERICSSON LM TEL-SPONSORED ADR 670SH	6,907.	7,357.
FRANCE TELECOM 376SH	8,293.	8,983.
FUJIFILM HOLDINGS 300SH	9,630.	10,119.
GLAXO SMITHKLINE 390SH	20,570.	15,226.
HONDA MOTOR CO 180SH	3,494.	6,485.
INTESA SANPAOLO 210SH	4,454.	4,442.
J SAINSBURY 270SH	7,501.	6,704.
KONINKLIJKE AHOLD-SP 808SH	8,010.	11,191.
FRANCE TELECOM 363SH	7,908.	8,711.
MS&AD INSURANCE GROUP 900SH	17,674.	10,665.
CARREFOUR 306SH	15,875.	16,494.
MARKS & SPENCER GROUP 1182SH	11,263.	16,111.
MITSUBISHI 1510SH	17,178.	7,037.
MIZUHO FINL GROUP 1520SH	18,266.	4,408.
NIPPON TELEG & TELE 810SH	17,652.	18,257.
NOKIA CORP 650SH	10,161.	6,955.
PORTUGAL TELECOM 610SH	8,399.	8,784.
SANOFI-AVENTIS 481SH	20,662.	16,888.
SEVEN & I HLDGS 130SH	6,135.	6,032.
SONY CORP 330SH	10,898.	11,167.
STMICROELECTRONICS NV-NY 1000SH	16,455.	8,770.
SUMITOMO MITSUI 2480SH	18,195.	7,415.
SWISS REINSURANCE 200SH	8,290.	9,598.
TELENORTE CELULAR 360SH	3,132.	5,522.

Form 990-PF, Page 2, Part II, Line 10b
L-10b Stmt

Continued

Line 10b - Investments - Corporate Stock:	End of Year Book Value	End of Year Fair Market Value
TELECOM ITALIA SPA 1165SH	33,548.	17,778.
TELECOMUNICACOES BRASILEIRAS 2000SH	16.	12.
TELEFONICA 44SH	1,265.	3,570.
TELEFONOS DE MEXICO 350SH	2,844.	5,418.
TIM PARTICIPACOES 90SH	506.	2,903.
TOKIO MARINE HOLDINGS 275SH	8,544.	7,725.
TOTAL SA 270SH	15,418.	14,710.
TOYOTA MOTOR CORP 150SH	11,272.	10,623.
UNILEVER 360SH	7,344.	10,688.
VIVO PARTICIPACOES 163SH	1,315.	4,667.
AMDOCS 392SH	10,282.	12,027.
ARCH CAPITAL GR 100SH	7,830.	8,639.
WILLIS GROUP 200SH	6,277.	6,360.
UBS 602SH	9,550.	10,246.
ACERGY SA 327SH	3,946.	6,596.
ADVANTEST CORP 448SH	12,160.	8,476.
L AIR LIQUIDE 588SH	8,784.	15,200.
AKZO NOBEL 214SH	10,084.	12,680.
BG GROUP 153 SH	7,396.	14,895.
BNP PARIBAS 138SH	3,296.	5,051.
BRITISH SKY BROADCASTING 171SH	6,387.	7,705.
BROOKFIELD ASSET MANAGEMENT 344SH	5,885.	10,224.
CPFL ENERGIA 115SH	7,019.	8,260.
CENOVUS ENERGY 320SH	8,901.	8,902.
CREDIT SUSSIE GROUP 150SH	6,272.	6,225.
DBS GROUP HOLDINGS 147SH	7,183.	6,328.
ENCANA 275SH	8,291.	7,761.
EXPERIAN 1251SH	6,706.	14,612.
FANUC LTD 181SH	6,424.	13,059.
GRUPO TELEVISA SA 257SH	5,003.	5,770.
GOUCO GROUP 469SH	5,996.	11,453.
HSBC HOLDINGS 192SH	11,670.	10,005.
ING GROUP 134SH	3,868.	1,445.
INTERNATIONAL POWER 153SH	4,676.	10,214.
KB FINANCIAL GROUP 123 SH	5,336.	5,523.
KONINKLIJKE PHILIPS ELECTRONICS 335SH	8,549.	10,201.
LONMIN 234SH	5,422.	6,531.
LONZA GROUP 362SH	3,949.	3,149.
MAGNA INTL 72SH	2,378.	6,519.
NATIONAL GRID PLC 190SH	8,134.	9,021.
NOVARTIS 252SH	12,880.	14,603.
NOVO-NORDISK 48SH	1,798.	5,030.
PUBLICIS GROUPE 723SH	12,682.	18,068.
SK TELECOM 456SH	9,055.	8,404.
SHAW COMMUNICATIONS 329SH	3,495.	7,034.
STATOIL 246SH	5,390.	5,370.
SUMITOMO MITSUI 5000SH	24,973.	14,950.
SYMRISE AG 255SH	3,204.	7,714.
THK CO LTD 408SH	2,898.	3,896.
TELEFONICA 79SH	4,297.	6,410.
TESCO 607SH	12,849.	12,528.
TEVA PHARMACEUTICAL 247SH	10,766.	12,814.

Form 990-PF, Page 2, Part II, Line 10b Continued
L-10b Stmt

Line 10b - Investments - Corporate Stock:	End of Year Book Value	End of Year Fair Market Value
TOKIO MARINE HOLDINGS 143SH	4,219.	4,017.
VODAFONE GROUP 349SH	8,893.	9,601.
YUE YUEN INDUSTRIAL 366SH	5,912.	6,544.
Total	2,561,139.	2,600,872.

Supporting Statement of:

Form 990-PF, p1/Line 4(b)

Description	Amount
FOREIGN DIVIDENDS	23,484.
FOREIGN DIVIDENDS-NQ	895.
DOMESTIC DIVIDENDS	7,598.
DOMESTIC DIVIDENDS-NQ	83.
MUTUAL FUNDS	1,833.
US GOVT & AGENCY	19,839.
Total	53,732.

Supporting Statement of:

Form 990-PF, p2/Line 2(b)

Description	Amount
50,000 FHLMC 4.750% 12/08/10	49,465.
50,000 FFCB 4.45% 8/8/11	48,750.
VDCU CERTIFICATE OF DEPOSIT	126,713.
Total	224,928.

Ben Cohen Charitable Trust
03-0368595
2009

Attachment 1 1/3

Form 990 PF, P.3, Part IV, lines 1c, 1d

TRUST YEAR ENDING 10/31/2010

TAX PREPARER - 1
TRUST ADMINISTRATOR FST
INVESTMENT OFFICER 1029

LEGEND F - FEDERAL S - STATE I - INHERITED
E - EXEMPT FROM STATE U - ACQ COST UNKNOWN

PROPERTY DESCRIPTION	SHARES	DATE	SALES PRICE	COST BASIS	GAIN/LOSS	TERM
100 0000 AKZO NOBEL NV SPONSORED ADR - 010199305 - MINOR = 61						
SOLD		07/22/2010	5684 01			
ACQ	100 0000	03/10/2004	5684 01	3816.43	1867.58	LT15
120 0000 AKZO NOBEL NV SPONSORED ADR - 010199305 - MINOR = 61						
SOLD		09/22/2010	7448 32			
ACQ	30 0000	03/10/2004	1862 08	1144 93	717 15	LT15
	90 0000	08/21/2008	5586 24	5335.70	250 54	LT15
80 0000 ASTRAZENECA PLC - 046353108 - MINOR = 61						
SOLD		08/12/2010	4107 56			
ACQ	80 0000	05/09/2007	4107 56	4319 09	-211 53	LT15
17 0000 ROYAL BANK OF SCOTLAND GROUP PLC - 075478008 - MINOR = 61						
SOLD		04/14/2010	11 94			
ACQ	17.0000	03/17/2008	11 94	104 48	-92 54	LT15
1822.0000 ROYAL BANK OF SCOTLAND GROUP PLC - 075478008 - MINOR = 61						
SOLD		04/14/2010	1267.14			
ACQ	598 0000	03/17/2008	415.89	3675 08	-3259 19	LT15
	1224 0000	05/20/2008	851 25	6012 08	-5160 83	LT15
1031 0000 ROYAL BANK OF SCOTLAND GROUP PLC - 075478008 - MINOR = 61						
SOLD		04/15/2010	727 29			
ACQ	1031 0000	05/20/2008	727 29	5064 10	-4336 81	LT15
202 0000 BRASIL TELECOM PARTICIPACOES S A - 105530109 - MINOR = 61						
SOLD		11/24/2009	12495 41			
ACQ	130 4500	09/20/2001	8069 26	3031 59	5037 67	LT15
	71 5500	07/11/2008	4426 15	0 00	4426 15	LT15
CHANGED 01/09/10 @GJ						
2377 BRASIL TELECOM S A - 10553M101 - MINOR = 61						
SOLD		11/24/2009	7 46			
ACQ	.2377	11/17/2009	7 46	7.44	0 02	ST
6064 BRASIL TELECOM S A - 10553M101 - MINOR = 61						
SOLD		12/31/2009	17 79			
ACQ	6064	11/23/2009	17 79	19 03	-1 24	ST
7267 BRASIL TELECOM SA-ADR-W/I - 10553M200 - MINOR = 61						
SOLD		11/24/2009	11 39			
ACQ	7267	11/17/2009	11 39	12 15	-0.76	ST
3440 BRASIL TELECOM SA-ADR-W/I - 10553M200 - MINOR = 61						
SOLD		12/31/2009	5 47			
ACQ	3440	11/23/2009	5 47	5 59	-0 12	ST
110 0000 BRISTOL MYERS SQUIBB CO COM - 110122108 - MINOR = 59						
SOLD		07/22/2010	2747 05			
ACQ	45 0000	11/11/2005	1123 79	978 30	145 49	LT15
	65 0000	12/14/2005	1623.26	1423 03	200 23	LT15
33 0000 BRISTOL MYERS SQUIBB CO COM - 110122108 - MINOR = 59						
SOLD		08/20/2010	873 13			
ACQ	33 0000	12/14/2005	873 13	722 46	150 67	LT15
183 0000 BRISTOL MYERS SQUIBB CO COM - 110122108 - MINOR = 59						
SOLD		08/20/2010	4813 89			
ACQ	183.0000	12/14/2005	4813 89	4006 36	807 53	LT15
30 0000 BRISTOL MYERS SQUIBB CO COM - 110122108 - MINOR = 59						
SOLD		08/20/2010	789 90			
ACQ	30 0000	12/14/2005	789 90	656 78	133 12	LT15
19 0000 BRISTOL MYERS SQUIBB CO COM - 110122108 - MINOR = 59						
SOLD		08/23/2010	505.30			
ACQ	19 0000	12/14/2005	505.30	415.96	89 34	LT15
240 0000 CISCO SYS INC COM - 17275R102 - MINOR = 59						
SOLD		02/08/2010	5692 77			
ACQ	163 0000	12/05/2008	3866.34	2497.65	1368 69	LT15
	77.0000	12/05/2008	1826 43	1151.59	674 84	LT15
290 0000 CISCO SYS INC COM - 17275R102 - MINOR = 59						
SOLD		03/16/2010	7582 70			
ACQ	20 0000	12/05/2008	522.94	299.12	223 82	LT15
	140.0000	04/17/2009	3660.61	2520 76	1139 85	ST
	130 0000	04/23/2009	3399 14	2263 43	1135 71	ST
75.0000 DU PONT E I DE NEMOURS & CO COM - 263534109 - MINOR = 59						
SOLD		09/03/2010	3186 60			
ACQ	19 0000	04/20/2009	807 27	509 23	298 04	LT15
	56.0000	04/20/2009	2379 33	1504 23	875 10	LT15
122 0000 DU PONT E I DE NEMOURS & CO COM - 263534109 - MINOR = 59						
SOLD		09/08/2010	5176.65			
ACQ	12.0000	04/20/2009	509 18	322 34	186.84	LT15
	110.0000	04/28/2009	4667 47	3019.63	1647.84	LT15
64 0000 FIFTH THIRD BANCORP COM - 316773100 - MINOR = 59						
SOLD		06/15/2010	894 38			
ACQ	64.0000	10/05/2005	894 38	2303 59	-1409 21	LT15
97 0000 FIFTH THIRD BANCORP COM - 316773100 - MINOR = 59						
SOLD		06/15/2010	1347 61			
ACQ	97.0000	10/05/2005	1347 61	3491.38	-2143 77	LT15
61.0000 FIFTH THIRD BANCORP COM - 316773100 - MINOR = 59						
SOLD		06/16/2010	849 98			
ACQ	61.0000	10/05/2005	849 98	2195.61	-1345 63	LT15
48 0000 FIFTH THIRD BANCORP COM - 316773100 - MINOR = 59						
SOLD		06/16/2010	671 17			
ACQ	48.0000	10/05/2005	671 17	1727 69	-1056 52	LT15
103 0000 FRONTIER COMMUNICATIONS CORP - 35906A108 - MINOR = 59						
SOLD		07/07/2010	734.60			
ACQ	48 0079	09/20/2001	342 39	647.36	-304 97	LT15
	31 2052	12/31/2003	222 56	276.46	-53.90	LT15
	23.7869	11/02/2009	169 65	183.19	-13 54	ST

Ben Cohen Charitable Trust
03-0368595
2009

Attachment 1 2/3

Form 990 PF, P.3, Part V, Lines 1c, 1d

ACCT 2M3M MC2699
FROM 11/01/2009
TO 10/31/2010

STATE STREET BANK & TRUST COMPANY
STATEMENT OF CAPITAL GAINS AND LOSSES
BEN COHEN CHARITABLE TRUST - BRANDES

RUN 11/10/2010
03 00:54 PM

TRUST YEAR ENDING 10/31/2010

TAX PREPARER 1
TRUST ADMINISTRATOR FST
INVESTMENT OFFICER 1029

LEGEND F - FEDERAL S - STATE I - INHERITED
E - EXEMPT FROM STATE U - ACQ COST UNKNOWN

PROPERTY DESCRIPTION	SHARES	DATE	SALES PRICE	COST BASIS	GAIN/LOSS	TERM
FOUND UPDATE						
.2171 FRONTIER COMMUNICATIONS CORP - 35906A108 - MINOR = 59						
SOLD		07/13/2010	1 56			
ACQ	2171	11/02/2009	1.56	1 67	-0 11	ST
158 0000 HSBC HLDGS PLC SPONSORED ADR NEW - 404280406 - MINOR = 61						
SOLD		11/09/2009	9117 71			
ACQ	98 1038	02/27/2007	5661.28	8656.61	-2995 33	LT15
	4 0581	05/10/2007	234 18	360.00	-125 82	LT15
	1.0000	07/05/2007	57.71	93 57	-35 86	LT15
	1 0000	10/04/2007	57.71	89 06	-31 35	LT15
	.9655	02/27/2007	55.72	85 20	-29.48	LT15
	2.0000	01/16/2008	115.41	170 73	-55 32	LT15
	4.8726	05/07/2008	281.18	405 60	-124 42	LT15
	46 0000	03/30/2009	2654.52	850 43	1804 09	ST
75 0000 HOME DEPOT INC COM - 437076102 - MINOR = 59						
SOLD		03/05/2010	2382.42			
ACQ	10 0000	10/31/2007	317.66	313 11	4 55	LT15
	65 0000	11/28/2007	2064 76	1817 94	246 82	LT15
75 0000 HOME DEPOT INC COM - 437076102 - MINOR = 59						
SOLD		03/05/2010	2383.98			
ACQ	75.0000	11/28/2007	2383.98	2097 62	286 36	LT15
130 0000 HOME DEPOT INC COM - 437076102 - MINOR = 59						
SOLD		04/23/2010	4690.33			
ACQ	28 0000	11/28/2007	1010 22	783 11	227.11	LT15
	82 0000	11/29/2007	2958.52	2278.08	680 44	LT15
	20 0000	12/06/2007	721.59	582 93	138 66	LT15
166.0000 HOME DEPOT INC COM - 437076102 - MINOR = 59						
SOLD		05/11/2010	5927.75			
ACQ	60 0000	12/06/2007	2142.56	1748 80	393 76	LT15
	106 0000	01/03/2008	3785.19	2782 73	1002 46	LT15
8 0000 HOME DEPOT INC COM - 437076102 - MINOR = 59						
SOLD		05/13/2010	286 40			
ACQ	8.0000	01/03/2008	286 40	210 02	76 38	LT15
24 0000 HOME DEPOT INC COM - 437076102 - MINOR = 59						
SOLD		05/13/2010	861 25			
ACQ	24.0000	01/03/2008	861 25	630 05	231 20	LT15
12 0000 HOME DEPOT INC COM - 437076102 - MINOR = 59						
SOLD		05/18/2010	431 90			
ACQ	12 0000	01/03/2008	431 90	315 02	116 88	LT15
140 0000 INTEL CORP CAP - 458140100 - MINOR = 59						
SOLD		04/16/2010	3362 66			
ACQ	65 0000	03/08/2006	1561.24	1302 60	258 64	LT15
	75 0000	03/29/2006	1801.43	1487 25	314 18	LT15
1518 MERCK & CO INC - 58933Y105 - MINOR = 59						
SOLD		11/13/2009	5.04			
ACQ	1518	09/23/2008	5.04	2 73	2.31	LT15
260 0000 MICRON TECHNOLOGY INC COM - 595112103 - MINOR = 59						
SOLD		12/04/2009	2192.81			
ACQ	23.0000	10/19/2004	193 98	267 81	-73 83	LT15
	217 0000	10/25/2004	1830 15	2543.42	-713 27	LT15
	20 0000	10/26/2004	168 68	234 02	-65 34	LT15
220 0000 MICRON TECHNOLOGY INC COM - 595112103 - MINOR = 59						
SOLD		12/07/2009	1874 42			
ACQ	173.0000	10/26/2004	1473.98	2024 28	-550 30	LT15
	47 0000	12/14/2004	400.44	547 40	-146 96	LT15
156 0000 MICRON TECHNOLOGY INC COM - 595112103 - MINOR = 59						
SOLD		12/21/2009	1434.60			
ACQ	156.0000	12/14/2004	1434.60	1816 92	-382 32	LT15
242 0000 MICRON TECHNOLOGY INC COM - 595112103 - MINOR = 59						
SOLD		12/21/2009	2216.68			
ACQ	19.0000	12/14/2004	174 04	221 29	-47 25	LT15
	141 0000	12/15/2004	1291.54	1673 08	-381 54	LT15
	82.0000	12/16/2004	751.11	962.45	-211 34	LT15
112 0000 MICRON TECHNOLOGY INC COM - 595112103 - MINOR = 59						
SOLD		12/22/2009	1048 46			
ACQ	55.0000	12/16/2004	514 87	645 54	-130 67	LT15
	57.0000	01/24/2007	533 59	755.86	-222 27	LT15
440 0000 MICRON TECHNOLOGY INC COM - 595112103 - MINOR = 59						
SOLD		12/23/2009	4361.25			
ACQ	253.0000	01/24/2007	2507.72	3354 96	-847.24	LT15
	187.0000	02/14/2007	1853.53	2368.07	-514.54	LT15
400 0000 MICRON TECHNOLOGY INC COM - 595112103 - MINOR = 59						
SOLD		01/06/2010	4483 64			
ACQ	133.0000	02/14/2007	1490 81	1684.25	-193.44	LT15
	267 0000	05/18/2007	2992 83	3049 81	-56.98	LT15
118 0000 MICRON TECHNOLOGY INC COM - 595112103 - MINOR = 59						
SOLD		01/08/2010	1303 28			
ACQ	118.0000	05/18/2007	1303 28	1347 86	-44.58	LT15
43.0000 MICRON TECHNOLOGY INC COM - 595112103 - MINOR = 59						
SOLD		01/11/2010	478 14			
ACQ	43 0000	05/18/2007	478 14	491 17	-13 03	LT15
22 0000 MICRON TECHNOLOGY INC COM - 595112103 - MINOR = 59						
SOLD		01/11/2010	240 22			
ACQ	22.0000	05/18/2007	240.22	251 29	-11 07	LT15

Ben Cohen Charitable Trust
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2009

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form 990PF, P3, Part IV, Lines 1c, 1d

ACCT 2M3M MC2699
FROM 11/01/2009
TO 10/31/2010

STATE STREET BANK & TRUST COMPANY
STATEMENT OF CAPITAL GAINS AND LOSSES
BEN COHEN CHARITABLE TRUST - BRANDES

RUN 11/10/2010
03 00 54 PM

TRUST YEAR ENDING 10/31/2010

TAX PREPARER 1
TRUST ADMINISTRATOR: FST
INVESTMENT OFFICER 1029

LEGEND. F - FEDERAL S - STATE I - INHERITED
E - EXEMPT FROM STATE U - ACQ COST UNKNOWN

PROPERTY DESCRIPTION	SHARES	DATE	SALES PRICE	COST BASIS	GAIN/LOSS	TERM
220.0000 PFIZER INC COM - 717081103 - MINOR = 59						
SOLD		02/01/2010	4127 14			
ACQ	119 5500	12/20/2004	2242 73	2921 97	-679 24	LT15
	100.4500	09/30/2005	1884 41	2512 72	-628 31	LT15
3.0000 ROYAL BANK OF SCOTLAND ADR - 780097689 - MINOR = 61						
SOLD		03/25/2010	40 51			
ACQ	2 1499	10/12/2005	29 03	442 77	-413 74	LT15
	.3793	09/07/2006	5.12	78 11	-72.99	LT15
	.1062	06/05/2007	1 43	21 87	-20 44	LT15
	3646	06/06/2006	4.92	75 10	-70 18	LT15
110.0000 SANOFI-AVENTIS ADR - 80105N105 - MINOR = 61						
SOLD		02/09/2010	4010.46			
ACQ	1 0000	07/12/2004	36 46	33 87	2.59	LT15
	109 0000	02/02/2005	3974 00	4022 10	-48.10	LT15
117.0000 SARA LEE CORP COM - 803111103 - MINOR = 59						
SOLD		04/06/2010	1657.27			
ACQ	117.0000	07/13/2006	1657 27	1642.22	15 05	LT15
213 0000 SARA LEE CORP COM - 803111103 - MINOR = 59						
SOLD		04/12/2010	3033 52			
ACQ	213 0000	07/13/2006	3033 52	2989.68	43 84	LT15
115 0000 SARA LEE CORP COM - 803111103 - MINOR = 59						
SOLD		05/18/2010	1712 51			
ACQ	115 0000	07/13/2006	1712.51	1614 15	98.36	LT15
340 0000 SARA LEE CORP COM - 803111103 - MINOR = 59						
SOLD		07/12/2010	4843.96			
ACQ	340.0000	07/13/2006	4843 96	4772.25	71.71	LT15
149 8482 SCHERING PLOUGH CORP COM - 806605101 - MINOR = 59						
SOLD		11/03/2009	3717.00			
ACQ	149 8482	09/23/2008	3717 00	2698 08	1018 92	LT15
130 0000 UNILEVER N V - 904784709 - MINOR = 61						
SOLD		03/15/2010	3976 82			
ACQ	130 0000	02/04/2004	3976 82	2956 93	1019 89	LT15
		TOTALS	143853 20	143750 00		

SUMMARY OF CAPITAL GAINS/LOSSES

FEDERAL	SHORT TERM	LONG TERM 28%	LONG TERM 15%	ST WASH SALE	LT WASH SALE	1250 GAIN
SUBTOTAL FROM ABOVE	4063 91	0 00	-3960 71	0 00	0 00	0 00*
COMMON TRUST FUND	~~0.00~~	0 00	~~0.00~~			0 00
CAPITAL GAIN DIVIDENDS	0 00	0.00	0 00			0 00
	4063.91	0 00	-3960.71	0 00	0 00	0 00

STATE	SHORT TERM	LONG TERM 28%	LONG TERM 15%	ST WASH SALE	LT WASH SALE	1250 GAIN
SUBTOTAL FROM ABOVE	4063.91	0.00	-3960 71	0 00	0 00	0 00*
COMMON TRUST FUND	0.00	0.00	0 00			0 00
CAPITAL GAIN DIVIDENDS	0 00	0 00	0.00			0 00
	4063 91	0 00	-3960.71	0 00	0 00	0 00

* - 1250 GAIN DETAILED ON TRANS PAGES, NOT ABOVE

CAPITAL LOSS CARRYOVER

FEDERAL	0 00	0 00
NON RESIDENT (FOREIG	N/A	N/A

Ben Cohen Charitable Trust
03-0368595
2009

Attachment 2 1/2

Form 990 PF, P.3, Part IV, lines 1e

ACCT 2M3M MC7824
FROM 11/01/2009
TO 10/31/2010

STATE STREET BANK & TRUST COMPANY
STATEMENT OF CAPITAL GAINS AND LOSSES
BEN COHEN CHAR TRUST-BOSTON COMMON

RUN 11/10/2010
03 03 46 PM

TRUST YEAR ENDING 10/31/2010

TAX PREPARER 1
TRUST ADMINISTRATOR FST
INVESTMENT OFFICER. 1009

LEGEND F - FEDERAL S - STATE I - INHERITED
E - EXEMPT FROM STATE U - ACQ COST UNKNOWN

PROPERTY DESCRIPTION	SHARES	DATE	SALES PRICE	COST BASIS	GAIN/LOSS	TERM
98 0000 ACERGY SA - 00443E104 - MINOR = 61						
SOLD		03/30/2010	1774 46			
ACQ	98 0000	08/01/2008	1774 46	1629 86	144 60	LT15
.7996 AIR LIQUIDE - 009126202 - MINOR = 61						
SOLD		07/06/2010	16 41			
ACQ	7996	12/28/2004	16 41	11 38	5.03	LT15
222 0000 AMADA CO LTD-UNSPON ADR - 022631204 - MINOR = 61						
SOLD		08/25/2010	5244 33			
ACQ	222 0000	02/03/2010	5244 33	6225 97	-981.64	ST
142 0000 BNP PARIBAS-ADR - 05565A202 - MINOR = 61						
SOLD		11/09/2009	139 92			
ACQ	142.0000		139 92		139 92	ST
27 0000 BNP PARIBAS-ADR - 05565A202 - MINOR = 61						
SOLD		04/28/2010	926 62			
ACQ	27 0000	08/06/2008	926 62	1360 26	-433 64	LT15
59 0000 BRITISH SKY BROADCASTING GROUP PLC - 111013108 - MINOR = 61						
SOLD		03/30/2010	2076.81			
ACQ	59 0000	05/24/2006	2076 81	2318 07	-241.26	LT15
429.0000 CENTRICA PLC-SPONSORED ADR - 15639K300 - MINOR = 61						
SOLD		12/08/2009	7190 54			
ACQ	174 0000	02/23/2009	2916 44	2741 32	175 12	ST
	255.0000	04/14/2009	4274 10	3510.99	763.11	ST
22 0000 CREDIT SUISSE GROUP - 225401108 - MINOR = 61						
SOLD		04/28/2010	1018 51			
ACQ	22 0000	10/09/2008	1018 51	836 43	182 08	LT15
0754 DBS GROUP HLDGS LTDSPONSORED ADR - 23304Y100 - MINOR = 61						
SOLD		07/22/2010	3 12			
ACQ	0754	07/19/2010	3 12	2 84	0 28	ST
5557 DBS GROUP HLDGS LTDSPONSORED ADR - 23304Y100 - MINOR = 61						
SOLD		10/26/2010	24 55			
ACQ	5557	10/25/2010	24 55	22 50	2.05	ST
54 0000 DENSO CORP-ADR - 24872B100 - MINOR = 61						
SOLD		09/17/2010	6241 29			
ACQ	40 0000	11/06/2008	4623 18	3462.60	1160.58	LT15
	6 0000	02/20/2009	693 48	450.06	243.42	LT15
	8 0000	12/21/2009	924 64	957 76	-33.12	ST
134 0000 ING GROEP NV RTS 12/11/09 - 456837996 - MINOR = 62						
SOLD		12/04/2009	331.50			
ACQ	134.0000	11/28/2009	331 50	0 00	331 50	ST
7 0000 INTERNATIONAL POWER PLC - 46018M104 - MINOR = 61						
SOLD		03/30/2010	339 49			
ACQ	7.0000	12/28/2004	339 49	213 92	125 57	LT15
259 0000 LG DISPLAY CO - 50186V102 - MINOR = 61						
SOLD		06/11/2010	4333 91			
ACQ	259.0000	06/30/2009	4333 91	3207 59	1126 32	ST
50 0000 MAGNA INTL INC CL A - 559222401 - MINOR = 61						
SOLD		10/20/2010	4405 73			
ACQ	40 0000	11/10/2008	3524 58	1296 13	2228.45	LT15
	10 0000	04/13/2009	881 15	330.29	550.86	LT15
210 0000 MAKITA CORP SPONSORED ADR - 560877300 - MINOR = 61						
SOLD		05/07/2010	6137 12			
ACQ	210.0000	12/22/2008	6137.12	4620.15	1516 97	LT15
202 0000 NIDEC CORP-ADR - 654090109 - MINOR = 61						
SOLD		11/20/2009	3896 17			
ACQ	202 0000	12/21/2007	3896 17	3630.47	265.70	LT15
391 0000 NIDEC CORP-ADR - 654090109 - MINOR = 61						
SOLD		02/16/2010	9329 53			
ACQ	13 0000	12/21/2007	310 19	233 64	76 55	LT15
	140 0000	12/27/2007	3340 50	2573 28	767.22	LT15
	15 0000	12/28/2007	357 91	273 47	84.44	LT15
	111 0000	01/04/2008	2648.54	2103 92	544 62	LT15
	89.0000	03/24/2008	2123.60	1420 19	703 41	LT15
	23.0000	10/14/2008	548 80	292 10	256 70	LT15
21 0000 NOVO-NORDISK A S ADR - 670100205 - MINOR = 61						
SOLD		11/19/2009	1385.37			
ACQ	21.0000	08/08/2006	1385 37	723 03	662 34	LT15
30 0000 NOVO-NORDISK A S ADR - 670100205 - MINOR = 61						
SOLD		10/13/2010	3057.85			
ACQ	30 0000	08/08/2006	3057 85	1032 89	2024.96	LT15
40 0000 NOVO-NORDISK A S ADR - 670100205 - MINOR = 61						
SOLD		10/20/2010	4027 93			
ACQ	40 0000	08/08/2006	4027 93	1377 19	2650.74	LT15
53 0000 PUBLICIS GROUPE S A ADR - 74463M106 - MINOR = 61						
SOLD		04/28/2010	1144 78			
ACQ	53 0000	12/28/2004	1144 78	867 88	276.90	LT15
436 0000 SYMRISE AG-UNSP ADR - 87155N109 - MINOR = 61						
SOLD		05/06/2010	9905 10			
ACQ	223.0000	11/28/2008	5066.14	2636 95	2429 19	LT15
	103.0000	02/23/2009	2339.97	1030 93	1309 04	LT15
	14.0000	03/16/2009	318.05	157 85	160 20	LT15
	96.0000	04/15/2009	2180.94	1304 99	875 95	LT15
46.0000 TAIWAN SEMICONDDUCTOR MFG CO SPONSORED ADR - 874039100 - MINOR = 61						
SOLD		11/19/2009	478.84			
ACQ	46.0000	12/28/2004	478.84	348 61	130.23	LT15

Ben Cohen Charitable Trust
03-0368595
2009

Attachment 2 2/2

Form 990 PF, p.3, Part IV, Line 1c

ACCT 2M3M MC7824
FROM 11/01/2009
TO 10/31/2010

STATE STREET BANK & TRUST COMPANY
STATEMENT OF CAPITAL GAINS AND LOSSES
BEN COHEN CHAR. TRUST-BOSTON COMMON

TRUST YEAR ENDING 10/31/2010

RUN 11/10/2010
03 03 46 PM

TAX PREPARER 1
TRUST ADMINISTRATOR: FST
INVESTMENT OFFICER 1009

LEGEND F - FEDERAL S - STATE I - INHERITED
E - EXEMPT FROM STATE U - ACQ COST UNKNOWN

PROPERTY DESCRIPTION		SHARES	DATE	SALES PRICE	COST BASIS	GAIN/LOSS	TERM
805 0000 TAIWAN SEMICONDDUCTOR MFG CO SPONSORED ADR - 874039100 - MINOR = 61							
	SOLD		08/06/2010	7996 73			
	ACQ	390 9405	12/28/2004	3883 53	2962 78	920 75	LT15
		261.2997	08/06/2008	2595 71	2646 80	-51.09	LT15
		152 7598	08/15/2008	1517 49	1598 28	-80 79	LT15
270.0000 TOKIO MARINE HOLDINGS INC-ADR - 889094108 - MINOR = 61							
	SOLD		09/17/2010	7527 09			
	ACQ	270 0000	12/28/2004	7527 09	8002 80	-475 71	LT15
56.0000 AMDOCS LTD COM - G02602103 - MINOR = 61							
	SOLD		03/30/2010	1691 16			
	ACQ	56 0000	12/28/2004	1691 16	1478 40	212 76	LT15
79 0000 SIGNET JEWELERS LTD - G81276100 - MINOR = 61							
	SOLD		11/19/2009	2166 69			
	ACQ	54.0000	12/20/2006	1481.03	2559.17	-1078 14	LT15
		20 0000	02/01/2008	548 53	561 02	-12.49	LT15
		5 0000	02/05/2008	137 13	126 68	10 45	LT15
89 0000 TRANSOCEAN LTD - H8817H100 - MINOR = 61							
	SOLD		06/10/2010	3989 80			
	ACQ	21 0000	10/09/2009	941 41	1898 05	-956 64	ST
		68 0000	11/12/2009	3048 39	5939 43	-2891 04	ST
			TOTALS	96,661.43	80978.92		

SUMMARY OF CAPITAL GAINS/LOSSES

FEDERAL	SHORT TERM	LONG TERM 28%	LONG TERM 15%	ST WASH SALE	LT WASH SALE	1250 GAIN
SUBTOTAL FROM ABOVE	-2464 06	0.00	18146 57	0.00	0 00	0 00*
COMMON TRUST FUND	~~0 00~~	0 00	0 00			0 00
CAPITAL GAIN DIVIDENDS	0 00	0 00	0 00			0 00
	-2464.06	0 00	18146 57	0 00	0 00	0 00

STATE	SHORT TERM	LONG TERM 28%	LONG TERM 15%	ST WASH SALE	LT WASH SALE	1250 GAIN
SUBTOTAL FROM ABOVE	-2464.06	0.00	18146 57	0 00	0 00	0 00*
COMMON TRUST FUND	0 00	0.00	0 00			0 00
CAPITAL GAIN DIVIDENDS	0 00	0 00	0 00			0.00
	-2464.06	0 00	18146 57	0 00	0 00	0 00

* - 1250 GAIN DETAILED ON TRANS PAGES, NOT ABOVE

CAPITAL LOSS CARRYOVER

FEDERAL	0.00	0 00
NON RESIDENT (FOREIG	N/A	N/A