

For calendar year 2019, or tax year beginning 01-01-2019, and ending 12-31-2019

Name of foundation ZOMA FOUNDATION INC		A Employer identification number 81-4630003	
% ROBERT A SMITH			
Number and street (or P.O. box number if mail is not delivered to street address) PO BOX 1860	Room/suite	B Telephone number (see instructions) (479) 464-1570	
City or town, state or province, country, and ZIP or foreign postal code BENTONVILLE, AR 72712		C If exemption application is pending, check here ▶ ☐	
G Check all that apply: ☐ Initial return ☐ Initial return of a former public charity ☐ Final return ☐ Amended return ☐ Address change ☐ Name change		D 1. Foreign organizations, check here..... ▶ ☐ 2. Foreign organizations meeting the 85% test, check here and attach computation ... ▶ ☐	
H Check type of organization: ☒ Section 501(c)(3) exempt private foundation ☐ Section 4947(a)(1) nonexempt charitable trust ☐ Other taxable private foundation		E If private foundation status was terminated under section 507(b)(1)(A), check here ▶ ☐	
I Fair market value of all assets at end of year (from Part II, col. (c), line 16) ▶ \$ 239,238,625	J Accounting method: ☒ Cash ☐ Accrual ☐ Other (specify) _____ (Part I, column (d) must be on cash basis.)		F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here ▶ ☐

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 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 (attach schedule)	1,173,031			
	2 Check ☐ if the foundation is not required to attach Sch. B				
	3 Interest on savings and temporary cash investments				
	4 Dividends and interest from securities . . .	4,743,144	4,743,144		
	5a Gross rents				
	b Net rental income or (loss) _____				
	6a Net gain or (loss) from sale of assets not on line 10	988,468			
	b Gross sales price for all assets on line 6a _____ 26,862,126				
	7 Capital gain net income (from Part IV, line 2) . . .		988,468		
	8 Net short-term capital gain				
	9 Income modifications				
	10a Gross sales less returns and allowances _____				
Operating and Administrative Expenses	b Less: Cost of goods sold				
	c Gross profit or (loss) (attach schedule)				
	11 Other income (attach schedule)	130,042	-80,202		
	12 Total. Add lines 1 through 11	7,034,685	5,651,410		
	13 Compensation of officers, directors, trustees, etc.	542,067			542,067
	14 Other employee salaries and wages				
	15 Pension plans, employee benefits				
	16a Legal fees (attach schedule)	109,987	0	0	109,987
	b Accounting fees (attach schedule)				
	c Other professional fees (attach schedule)	695,355	87,000		608,355
	17 Interest	58,600	58,600		
	18 Taxes (attach schedule) (see instructions)	92,377	92,377		
	19 Depreciation (attach schedule) and depletion				
	20 Occupancy				
	21 Travel, conferences, and meetings	1,333			1,333
	22 Printing and publications				
	23 Other expenses (attach schedule)	644,876	614,848		30,028
	24 Total operating and administrative expenses. Add lines 13 through 23	2,144,595	852,825	0	1,291,770
	25 Contributions, gifts, grants paid	6,753,653			6,753,653
	26 Total expenses and disbursements. Add lines 24 and 25	8,898,248	852,825	0	8,045,423
	27 Subtract line 26 from line 12:				
	a Excess of revenue over expenses and disbursements	-1,863,563			
	b Net investment income (if negative, enter -0-)		4,798,585		
c Adjusted net income (if negative, enter -0-)					

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	161,390	171,482	171,482
	2 Savings and temporary cash investments	231,208,144	11,024,715	11,024,715
	3 Accounts receivable ▶ <u>26,091</u>			
	Less: allowance for doubtful accounts ▶ _____	428,998	26,091	26,091
	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 instructions)			
	7 Other notes and loans receivable (attach schedule) ▶ <u>3,250,000</u>			
	Less: allowance for doubtful accounts ▶ _____	1,950,000	3,250,000	3,250,000
	8 Inventories for sale or use			
	9 Prepaid expenses and deferred charges			
	10a Investments—U.S. and state government obligations (attach schedule)			
	b Investments—corporate stock (attach schedule)			
	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)		217,412,681	224,766,337	
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 the instructions. Also, see page 1, item I)	233,748,532	231,884,969	239,238,625	
Liabilities	17 Accounts payable and accrued expenses			
	18 Grants payable			
	19 Deferred revenue			
	20 Loans from officers, directors, trustees, and other disqualified persons			
	21 Mortgages and other notes payable (attach schedule)			
	22 Other liabilities (describe ▶ _____)			
	23 Total liabilities (add lines 17 through 22)	0	0	
Net Assets or Fund Balances	Foundations that follow FASB ASC 958, check here ▶ ☐ and complete lines 24, 25, 29 and 30.			
	24 Net assets without donor restrictions			
	25 Net assets with donor restrictions			
	Foundations that do not follow FASB ASC 958, check here ▶ ☒ and complete lines 26 through 30.			
	26 Capital stock, trust principal, or current funds			
	27 Paid-in or capital surplus, or land, bldg., and equipment fund			
	28 Retained earnings, accumulated income, endowment, or other funds	233,748,532	231,884,969	
	29 Total net assets or fund balances (see instructions)	233,748,532	231,884,969	
30 Total liabilities and net assets/fund balances (see instructions) .	233,748,532	231,884,969		

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 29 (must agree with end-of-year figure reported on prior year's return)	1	233,748,532
2 Enter amount from Part I, line 27a	2	-1,863,563
3 Other increases not included in line 2 (itemize) ▶ _____	3	
4 Add lines 1, 2, and 3	4	231,884,969
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 29 .	6	231,884,969

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 shs. MLC Co.)	(b) How acquired P—Purchase D—Donation	(c) Date acquired (mo., day, yr.)	(d) Date sold (mo., day, yr.)
1a			

(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			
b			
c			
d			
e			

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69			(l) Gains (Col. (h) gain minus col. (k), but not less than -0-) or Losses (from col.(h))
(i) F.M.V. as of 12/31/69	(j) Adjusted basis as of 12/31/69	(k) Excess of col. (i) over col. (j), if any	
a			
b			
c			
d			
e			

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	988,468
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 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 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 (col. (b) divided by col. (c))
2018	12,508,204	192,509,359	0.064975
2017	1,935,741	60,247,339	0.03213
2016	0	1,418,441	0.0
2015			
2014			

2 Total of line 1, column (d)	2	0.097105
3 Average distribution ratio for the 5-year base period—divide the total on line 2 by 5.0, or by the number of years the foundation has been in existence if less than 5 years	3	0.032368
4 Enter the net value of noncharitable-use assets for 2019 from Part X, line 5	4	229,377,998
5 Multiply line 4 by line 3	5	7,424,507
6 Enter 1% of net investment income (1% of Part I, line 27b)	6	47,986
7 Add lines 5 and 6	7	7,472,493
8 Enter qualifying distributions from Part XII, line 4	8	10,545,423

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 instructions)

1a	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 instructions)		
b	Domestic foundations that meet the section 4940(e) requirements in Part V, check here ☒ and enter 1% of Part I, line 27b	1	47,986
c	All other domestic foundations enter 2% of line 27b. Exempt foreign organizations enter 4% of Part I, line 12, col. (b)		
2	Tax under section 511 (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter -0-)	2	
3	Add lines 1 and 2.	3	47,986
4	Subtitle A (income) tax (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter -0-)	4	
5	Tax based on investment income. Subtract line 4 from line 3. If zero or less, enter -0-	5	47,986
6	Credits/Payments:		
a	2019 estimated tax payments and 2018 overpayment credited to 2019	6a	161,558
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	161,558
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	
10	Overpayment. If line 7 is more than the total of lines 5 and 8, enter the amount overpaid ▶	10	113,572
11	Enter the amount of line 10 to be: Credited to 2020 estimated tax ▶ 113,572 Refunded ▶	11	

Part VII-A Statements Regarding Activities

	Yes	No
1a 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	No
b Did it spend more than \$100 during the year (either directly or indirectly) for political purposes? (see Instructions for definition). <i>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.</i>	1b	No
c Did the foundation file Form 1120-POL for this year?	1c	No
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? <i>If "Yes," attach a detailed description of the activities.</i>	2	No
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? <i>If "Yes," attach a conformed copy of the changes</i> 	3	No
4a Did the foundation have unrelated business gross income of \$1,000 or more during the year?	4a	Yes
b If "Yes," has it filed a tax return on Form 990-T for this year?	4b	Yes
5 Was there a liquidation, termination, dissolution, or substantial contraction during the year? <i>If "Yes," attach the statement required by General Instruction T.</i> 	5	No
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	Yes
7 Did the foundation have at least \$5,000 in assets at any time during the year? <i>If "Yes," complete Part II, col. (c), and Part XV.</i>	7	Yes
8a Enter the states to which the foundation reports or with which it is registered (see instructions) ▶ CO, DE		
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? <i>If "No," attach explanation .</i>	8b	Yes
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 2019 or the taxable year beginning in 2019? See the instructions for Part XIV. <i>If "Yes," complete Part XIV</i>	9	No
10 Did any persons become substantial contributors during the tax year? <i>If "Yes," attach a schedule listing their names and addresses.</i>	10	No

Part VII-A Statements Regarding Activities (continued)

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		No
12	Did the foundation make a distribution to a donor advised fund over which the foundation or a disqualified person had advisory privileges? If "Yes," attach statement. See instructions	12		No
13	Did the foundation comply with the public inspection requirements for its annual returns and exemption application? Website address ► _____	13	Yes	
14	The books are in care of ► <u>ROBERT A SMITH</u> Telephone no. ► <u>(479) 464-1570</u>			

Located at ► PO BOX 1860 BENTONVILLE AR ZIP+4 ► 72712

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		
16	At any time during calendar year 2019, did the foundation have an interest in or a signature or other authority over a bank, securities, or other financial account in a foreign country?	16	Yes	No
	See the instructions for exceptions and filing requirements for FinCEN Form 114. If "Yes", enter the name of the foreign country ► <u>CA, DA, UK, IS, JA</u>		Yes	

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.

1a	During the year did the foundation (either directly or indirectly):		Yes	No
	(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 instructions	1b		No
	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 2019?	1c		No
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 2019, did the foundation have any undistributed income (lines 6d and 6e, Part XIII) for tax year(s) beginning before 2019? ☐ 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 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____			
3a	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 2019 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 2019.)	3b		
4a	Did the foundation invest during the year any amount in a manner that would jeopardize its charitable purposes?	4a		No
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 2019?	4b		No

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:		Yes	No
(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 4945(d)(4)(A)? 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	No
	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? If "Yes," attach the statement required by Regulations section 53.4945–5(d).	☒ Yes ☐ No		
6a	Did the foundation, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	☐ Yes ☒ No	6b	No
b	Did the foundation, during the year, pay premiums, directly or indirectly, on a personal benefit contract? 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	7b	
b	If "Yes", did the foundation receive any proceeds or have any net income attributable to the transaction?			
8	Is the foundation subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess parachute payment during the year?	☐ Yes ☒ No		

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
See Additional Data Table				
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
Total number of other employees paid over \$50,000.				

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
RASTEGAR PANCHALL P C 10 E 40TH STREET SUITE 3307 NEW YORK, NY 10016	LEGAL	91,247
MANATT HEALTH STRATEGIES LLC ONE EMBARCADERO CENTER SAN FRANCISCO, CA 94111	STRATEGIC CONSULTING	170,000
SUMMIT VIEW STRATEGY CONSULTING LLC 5420 S QUEBEC STREET 206 GREENWOOD VILLAGE, CO 80111	STRATEGIC CONSULTING	120,501
MATHEMATICA POLICY RESEARCH INC 1100 FIRST STREET NE 12TH FLOOR WASHINGTON, DC 20002	PROGRAM EVALUATION	84,069
MISSION SPARK LLC PO BOX 202466 DENVER, CO 80220	STRATEGIC CONSULTING	75,181

Total number of others receiving over \$50,000 for professional services. ►

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 LANDED DENVER EDUCATION, LLC - LOAN	1,500,000
2 TELLURIDE FOUNDATION - LOAN	1,000,000
All other program-related investments. See instructions.	
3 _____ _____ _____	
Total. Add lines 1 through 3 ►	2,500,000

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	98,283,231
b	Average of monthly cash balances.	1b	134,587,833
c	Fair market value of all other assets (see instructions).	1c	0
d	Total (add lines 1a, b, and c).	1d	232,871,064
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	0
3	Subtract line 2 from line 1d.	3	232,871,064
4	Cash deemed held for charitable activities. Enter 1 1/2% of line 3 (for greater amount, see instructions).	4	3,493,066
5	Net value of noncharitable-use assets. Subtract line 4 from line 3. Enter here and on Part V, line 4	5	229,377,998
6	Minimum investment return. Enter 5% of line 5.	6	11,468,900

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	11,468,900
2a	Tax on investment income for 2019 from Part VI, line 5.	2a	47,986
b	Income tax for 2019. (This does not include the tax from Part VI.).	2b	
c	Add lines 2a and 2b.	2c	47,986
3	Distributable amount before adjustments. Subtract line 2c from line 1.	3	11,420,914
4	Recoveries of amounts treated as qualifying distributions.	4	1,200,000
5	Add lines 3 and 4.	5	12,620,914
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	12,620,914

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	8,045,423
b	Program-related investments—total from Part IX-B.	1b	2,500,000
2	Amounts paid to acquire assets used (or held for use) directly in carrying out charitable, etc., purposes.	2	0
3	Amounts set aside for specific charitable projects that satisfy the:		
a	Suitability test (prior IRS approval required).	3a	0
b	Cash distribution test (attach the required schedule).	3b	0
4	Qualifying distributions. Add lines 1a through 3b. Enter here and on Part V, line 8, and Part XIII, line 4	4	10,545,423
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	47,986
6	Adjusted qualifying distributions. Subtract line 5 from line 4.	6	10,497,437

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 2018	(c) 2018	(d) 2019
1 Distributable amount for 2019 from Part XI, line 7				12,620,914
2 Undistributed income, if any, as of the end of 2019:				
a Enter amount for 2018 only.			0	
b Total for prior years: 2017, 2016, 2015		0		
3 Excess distributions carryover, if any, to 2019:				
a From 2014.				
b From 2015.				
c From 2016.				0
d From 2017.				2,524,234
e From 2018.				2,957,838
f Total of lines 3a through e.	5,482,072			
4 Qualifying distributions for 2019 from Part XII, line 4: ► \$ <u>10,545,423</u>				
a Applied to 2018, but not more than line 2a			0	
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 2019 distributable amount.				10,545,423
e Remaining amount distributed out of corpus		0		
5 Excess distributions carryover applied to 2019. (If an amount appears in column (d), the same amount must be shown in column (a).)	2,075,491			2,075,491
6 Enter the net total of each column as indicated below:				
a Corpus. Add lines 3f, 4c, and 4e. Subtract line 5	3,406,581			
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 2018. Subtract line 4a from line 2a. Taxable amount—see instructions.			0	
f Undistributed income for 2019. Subtract lines 4d and 5 from line 1. This amount must be distributed in 2020.				0
7 Amounts treated as distributions out of corpus to satisfy requirements imposed by section 170(b)(1)(F) or 4942(g)(3) (Election may be required - see instructions).				
8 Excess distributions carryover from 2014 not applied on line 5 or line 7 (see instructions).				
9 Excess distributions carryover to 2020. Subtract lines 7 and 8 from line 6a.	3,406,581			
10 Analysis of line 9:				
a Excess from 2015.				
b Excess from 2016.				
c Excess from 2017.				448,743
d Excess from 2018.				2,957,838
e Excess from 2019.				

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

1a If the foundation has received a ruling or determination letter that it is a private operating foundation, and the ruling is effective for 2019, enter the date of the ruling. ▶					
b Check box to indicate whether the organization is a private operating foundation described in section ☐ 4942(j)(3) or ☐ 4942(j)(5)					
2a Enter the lesser of the adjusted net income from Part I or the minimum investment return from Part X for each year listed	Tax year	Prior 3 years			(e) Total
	(a) 2019	(b) 2018	(c) 2017	(d) 2016	
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 foundation 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).)	
BENJAMIN S WALTON	
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.	
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. to individuals or organizations under other conditions, complete items 2a, b, c, and d. See instructions	
a The name, address, and telephone number or email address of the person to whom applications should be addressed:	
b The form in which applications should be submitted and information and materials they should include:	
c Any submission deadlines:	
d Any restrictions or limitations on awards, such as by geographical areas, charitable fields, kinds of institutions, or other factors:	

Part XV **Supplementary Information** (continued)**3 Grants and Contributions Paid During the Year or Approved for Future Payment**

Recipient	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
Name and address (home or business)				
a <i>Paid during the year</i> See Additional Data Table				
Total			3a	6,753,653
b <i>Approved for future payment</i>				
Total			3b	

Unrelated business income		Excluded by section 512, 513, or 514		(e) Related or exempt function income (See instructions.)
(a) Business code	(b) Amount	(c) Exclusion code	(d) Amount	
1 Program service revenue:				
a <u>PASS THROUGH PARTNERSHIP ORDINARY INCOME</u>				
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				
4 Dividends and interest from securities.		14	4,743,144	
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.	523999	210,244		
8 Gain or (loss) from sales of assets other than inventory		18	988,468	
9 Net income or (loss) from special events:				
10 Gross profit or (loss) from sales of inventory				
11 Other revenue:				
a <u>NT - SECTION 988 LOSS</u>		18	-72,514	
b <u>NT- FOREIGN CURRENCY EXCHANGE LOSS</u>		18	-7,688	
c _____				
d _____				
e _____				
12 Subtotal. Add columns (b), (d), and (e).		210,244	5,651,410	
13 Total. Add line 12, columns (b), (d), and (e).				5,861,654

[illegible]

Part XVII

- | | Yes | No |
|--|-----|----|
|--|-----|----|

--	--	--

- | | | |
|-------|--|----|
| 1a(1) | | No |
| 1a(2) | | No |

--	--	--

- | | | |
|--------------|--|-----------|
| 1b(1) | | No |
| 1b(2) | | No |
| 1b(3) | | No |
| 1b(4) | | No |
| 1b(5) | | No |
| 1b(6) | | No |

1c		No
----	--	----

value
ue

[illegible]

2a Is the foundation directly or indirectly affiliated with, or related to, one or more tax-exempt organizations

described in section 501(c) (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 ***** Signature of officer or trustee	2020-11-09 Date	***** Title
---	-------------------------------------	---------------------------------

May the IRS discuss this return with the preparer shown below

(see instr.) ☒ **Yes** ☐ **No**

Paid Preparer Use Only	KENT C CROUCH				
	Firm's name ► WALTON ENTERPRISES LLC				Firm's EIN ►
	Firm's address ► PO BOX 1860 BENTONVILLE, AR 72712				Phone no. (479) 464-1500

May the IRS discuss this return with the preparer shown below

(see instr.) ☒ **Yes** ☐ **No**

Form 990PF Part VIII Line 1 - List all officers, directors, trustees, foundation managers and their compensation

(a) Name and address	Title, and average hours per week (b) devoted to position	(c) Compensation (If not paid, enter -0-)	(d) Contributions to employee benefit plans and deferred compensation	Expense account, (e) other allowances
BENJAMIN S WALTON  PO BOX 1860 BENTONVILLE, AR 72712	CO-PRESIDENT & DIRECTOR 5.0	0	0	0
LUCY ANA WALTON  PO BOX 1860 BENTONVILLE, AR 72712	CO-PRESIDENT & DIRECTOR 5.0	0	0	0
VALERIA ALBEROLA  PO BOX 1860 BENTONVILLE, AR 72712	TREASURER 20.0	0	0	0
LISA MONTEZ  PO BOX 1860 BENTONVILLE, AR 72712	SECRETARY 2.0	0	0	0
ZOMA HOLDINGS LLC  100 JACKSON STREET DENVER, CO 80206	0 0	542,067	0	0

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient	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
Name and address (home or business)				
a <i>Paid during the year</i>				
2020 MOM27101 ISLAND VIEW COURT VALENCIA, CA 91355		PC	EARLY CHILDHOOD DEVELOPMENT	36,500
BRIGHT BY THREE3605 MLK JR BLVD DENVER, CO 80205		PC	EARLY CHILDHOOD DEVELOPMENT	450,000
CHILDREN'S HOSPITAL COLORADO FOUNDATION 13123 EAST 16TH AVENUE BOX 130 AURORA, CO 80045		PC	EARLY CHILDHOOD DEVELOPMENT	413,772
Total ▶ 3a				6,753,653

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient	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
Name and address (home or business)				
a <i>Paid during the year</i>				
CITY AND COUNTY OF DENVER 1200 FEDERAL BLVD DENVER, CO 80204		GOV	EARLY CHILDHOOD DEVELOPMENT	174,856
CLAYTON EARLY LEARNING 3801 MARTIN LUTHER KING BLVD DENVER, CO 80205		PC	EARLY CHILDHOOD DEVELOPMENT	50,000
COLORADO CHILDREN'S CAMPAIGN 1580 LINCOLN STREET SUITE 420 DENVER, CO 80203		PC	EARLY CHILDHOOD DEVELOPMENT	50,000
Total ► 3a				6,753,653

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment				
Recipient	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
Name and address (home or business)				
a <i>Paid during the year</i>				
COLORADO NONPROFIT DEVELOPMENT CENTER 789 SHERMAN STREET SUITE 250 DENVER, CO 80203		PC	EARLY CHILDHOOD DEVELOPMENT	125,000
COLORADO WORKFORCE DEVELOPMENT COUNCIL 633 17TH STREET 900 DENVER, CO 80202		PC	WORKFORCE DEVELOPMENT	375,000
CONSENSUS BUILDING INSTITUTE 100 CAMBRIDGE PARK DRIVE SUITE 302 CAMBRIDGE, MA 21400		PC	EDUCATION - SUPPORT eLAB	18,062
Total ▶ 3a				6,753,653

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment				
Recipient	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
Name and address (home or business)				
a <i>Paid during the year</i>				
DENVER CHILDREN'S ADVOCACY CENTER 2149 FEDERAL BLVD DENVER, CO 80211		PC	EARLY CHILDHOOD DEVELOPMENT	50,000
DENVER PUBLIC LIBRARY FRIENDS FOUNDATION 10 W 14TH AVENUE PARKWAY DENVER, CO 80204		PC	EARLY CHILDHOOD DEVELOPMENT	90,000
EARLY MILESTONES COLORADO 165 MADISON STREET DENVER, CO 80206		PC	EARLY CHILDHOOD DEVELOPMENT	50,000
Total ▶ 3a				6,753,653

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment				
Recipient	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
Name and address (home or business)				
a <i>Paid during the year</i>				
ENDEAVOR GLOBAL 900 BROADWAY SUITE 301 NEW YORK, NY 10003		PC	ECONOMIC DEVELOPMENT	500,000
ENERGY FOUNDATION 301 BATTERY STREET 5TH FLOOR SAN FRANCISCO, CO 94111		PC	ENVIRONMENT - CLEAN ENERGY	491,158
FUNDACION IMPULSORA de un SECTOR en la ECONOMIA ALCANTARA 443 LOS CONDES SANTIAGO CI		NC	COMMUNITY DEVELOPMENT	115,000
Total ▶ 3a				6,753,653

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment				
Recipient	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
Name and address (home or business)				
a <i>Paid during the year</i>				
FUNDACION VIENTO SUR MALAGA 529 depto 203 LOS CONDES SANTIAGO CI		NC	COMMUNITY DEVELOPMENT	1,296,270
ILLUMINATE COLORADO 1530 WEST 31TH AVENUE SUITE 118 DENVER, CO 80204		PC	EARLY CHILDHOOD DEVELOPMENT	50,000
INVEST IN KIDS 1775 SHERMAN STREET SUITE 2075 DENVER, CO 80203		PC	EARLY CHILDHOOD DEVELOPMENT	152,388
Total ▶ 3a				6,753,653

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment				
Recipient	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
Name and address (home or business)				
a <i>Paid during the year</i>				
LENA FOUNDATION 5525 CENTRAL AVENUE 100 BOULDER, CO 80301		PC	EARLY CHILDHOOD DEVELOPMENT	15,000
MENTAL HEALTH COLORADO 1120 LINCOLN STREET SUITE 1606 DENVER, CO 80203		PC	EARLY CHILDHOOD DEVELOPMENT	25,000
MILE HIGH UNITED WAYPO BOX 5547 DENVER, CO 80205		PC	COMMUNITY DEVELOPMENT	25,000
Total ▶ 3a				6,753,653

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment				
Recipient	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
Name and address (home or business)				
a <i>Paid during the year</i>				
NATIONAL COMMITTEE FOR QUALITY ASSURANCE 1100 13TH STREET NW THIRD FLOOR WASHINGTON, DC 20005		PC	IMPROVE HEALTHCARE	89,898
RALSTON HOUSE 10795 WEST 58TH AVENUE ARVADA, CO 80002		PC	EARLY CHILDHOOD DEVELOPMENT	15,000
ROCKEFELLER PHILANTHROPY ADVISORS INC 6 WEST 48TH STREET 10TH FLOOR NEW YORK, NY 10036		PC	PHILANTHROPY DEVELOPMENT	333,000
Total ▶ 3a				6,753,653

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment				
Recipient	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
Name and address (home or business)				
a <i>Paid during the year</i>				
ROSE COMMUNITY FOUNDATION 4500 CHERRY CREEK DRIVE SOUTH SUIT DENVER, CO 80246		PC	COMMUNITY DEVELOPMENT	5,000
SAINT JOSEPH HOSPITAL FOUNDATION 1375 EAST 19TH AVENUE DENVER, CO 80218		PC	EARLY CHILDHOOD DEVELOPMENT	306,216
TENNYSON CENTER FOR CHILDREN 2950 TENNYSON STREET DENVER, CO 80212		PC	EARLY CHILDHOOD DEVELOPMENT	564,000
Total ▶ 3a				6,753,653

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment				
Recipient	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
Name and address (home or business)				
a <i>Paid during the year</i>				
THE CIVIC CANOPY 3532 FRANKLIN STREET SUITE H DENVER, CO 80305		PC	EARLY CHILDHOOD DEVELOPMENT	42,601
TSNE MISSIONWORKS NONPROFIT CENTER 89 SOUTH STREET BOSTON, MA 02111		PC	COMMUNITY DEVELOPMENT	40,000
UNIVERSITY OF COLORADO FOUNDATION 1800 GRANT STREET SUITE 725 DENVER, CO 80203		PC	EARLY CHILDHOOD DEVELOPMENT	804,932
Total ▶ 3a				6,753,653

TY 2019 Compensation Explanation

Name: ZOMA FOUNDATION INC
EIN: 81-4630003

Person Name	Explanation
ZOMA HOLDINGS LLC	REPORTED AS AUTHORIZED UNDER IRS ANNOUNCEMENT 2001-33. NO INDIVIDUAL LISTED RECEIVED COMPENSATION FROM ZOMA HOLDINGS, LLC OR ANY OTHER SOURCE FOR SERVICES TO THE FOUNDATION.

Note: To capture the full content of this document, please select landscape mode (11" x 8.5") when printing.

TY 2019 Depreciation Schedule

Name: ZOMA FOUNDATION INC

EIN: 81-4630003

Note: To capture the full content of this document, please select landscape mode (11" x 8.5") when printing.

TY 2019 Expenditure Responsibility Statement

Name: ZOMA FOUNDATION INC

EIN: 81-4630003

Grantee's Name	Grantee's Address	Grant Date	Grant Amount	Grant Purpose	Amount Expended By Grantee	Any Diversion By Grantee?	Dates of Reports By Grantee	Date of Verification	Results of Verification
FUNDACION IMPULSORA DE UN NUEVO SECTOR	PRESIDENTE ERRAURIZ 3949 LAS CONDES SANTIAGO CI	2017-08-17	803,000	IMPLEMENT STRATEGIC ENTREPRENEURIAL INITIATIVES	761,153	NO	APRIL 1, 2020	2020-04-01	THE GRANTEE HAS PROVIDED THE FOUNDATION WITH THE REQUIRED REPORTS. THE FOUNDATION HAS NO REASON TO DOUBT THE ACCURACY OR RELIABILITY OF THE REPORT; THEREFORE, NO FURTHER VERIFICATION BY THE FOUNDATION IS DEEMED NECESSARY.
FUNDACION VIENTO SUR	MALAGA 529 DEPTO 203 LOS CONDES SANTIAGO CI	2017-12-01	110,000	DEVELOP A LANDSCAPE REPORT ON PROVIDING INSIGHT INTO AREAS OF CHARITABLE NEED IN CHILE	110,000	NO	NOVEMBER 5, 2020	2020-11-05	THE GRANTEE HAS PROVIDED THE FOUNDATION WITH THE REQUIRED REPORTS. THE FOUNDATION HAS NO REASON TO DOUBT THE ACCURACY OR RELIABILITY OF THE REPORT; THEREFORE, NO FURTHER VERIFICATION BY THE FOUNDATION IS DEEMED NECESSARY.
HealthONE	700 POTOMAC AURORA, CO 80011	2018-10-18	195,000	CREATION OF A MOBILE APPLICATION TO SUPPRT MATERNAL MENTAL HEALTH AT ROSE MEDICAL CENTER	195,000	NO	APRIL 23, 2020	2020-04-23	THE GRANTEE HAS PROVIDED THE FOUNDATION WITH THE REQUIRED REPORTS. THE FOUNDATION HAS NO REASON TO DOUBT THE ACCURACY OR RELIABILITY OF THE REPORT; THEREFORE, NO FURTHER VERIFICATION BY THE FOUNDATION IS DEEMED NECESSARY
FUNDACION VIENTO SUR	MALAGA 529 DEPTO 203 LOS CONDES SANTIAGO CI	2018-06-15	497,887	PROVIDE SUPPORT FOR PHASE II CONSTRUCTION OF COLEGIO CREE - A CHILEAN SCHOOL	497,887	NO	NOVEMBER 5, 2020	2020-11-05	THE GRANTEE HAS PROVIDED THE FOUNDATION WITH THE REQUIRED REPORTS. THE FOUNDATION HAS NO REASON TO DOUBT THE ACCURACY OR RELIABILITY OF THE REPORT; THEREFORE, NO FURTHER VERIFICATION BY THE FOUNDATION IS DEEMED NECESSARY.
FUNDACION VIENTO SUR	MALAGA 529 DEPTO 203 LOS CONDES SANTIAGO CI	2018-06-14	150,092	PROVIDE SUPPORT FOR UNIDOS - IMAGINA	150,092	NO	NOVEMBER 5, 2020	2020-11-05	THE GRANTEE HAS PROVIDED THE FOUNDATION WITH THE REQUIRED REPORTS. THE FOUNDATION HAS NO REASON TO DOUBT THE ACCURACY OR RELIABILITY OF THE REPORT; THEREFORE, NO FURTHER VERIFICATION BY THE FOUNDATION IS DEEMED NECESSARY.
LANDED DENVER EDUCATORS LLC	548 MARKET STREET 79600 SAN FRANCISCO, CA 94104	2018-05-24	2,250,000	PROGRAM RELATED INVESTMENT PROVIDING FUNDS FOR TEACHERS TO PURCHASE HOMES IN THE DENVER, CO AREA.	2,250,000	NO	JANUARY 22, 2020	2020-01-22	THE GRANTEE/BORROWER HAS PROVIDED THE FOUNDATION WITH THE REQUIRED REPORTS. THE FOUNDATION HAS NO REASON TO DOUBT THE ACCURACY OR RELIABILITY OF THE REPORT; THEREFORE, NO FURTHER VERIFICATION BY THE FOUNDATION IS DEEMED NECESSARY. IN ADDITION, THE GRANTEE/BORROWER HAS PROVIDED THE FOUNDATION WITH A COPY OF THEIR INTERNAL FINANCIAL STATEMENTS AS OF DECEMBER 31, 2019.
FUNDACION VIENTO SUR	MALAGA 529 DEPTO 203 LOS CONDES SANTIAGO CI	2019-01-07	1,292,027	SUPPORT CHARITABLE ACTIVITIES IN EDUCATION, HEALTH, ENVIRONMENT AND SOCIAL ISSUES IN CHILE.	1,292,027	NO	NOVEMBER 13, 2020	2020-11-13	THE GRANTEE HAS PROVIDED THE FOUNDATION WITH THE REQUIRED REPORTS. THE FOUNDATION HAS NO REASON TO DOUBT THE ACCURACY OR RELIABILITY OF THE REPORT; THEREFORE, NO FURTHER VERIFICATION BY THE FOUNDATION IS DEEMED NECESSARY.

TY 2019 Investments - Other Schedule**Name:** ZOMA FOUNDATION INC**EIN:** 81-4630003**Investments Other Schedule 2**

Category/ Item	Listed at Cost or FMV	Book Value	End of Year Fair Market Value
MSCI CUSTOM ESG LEADERS		104,057,768	111,068,479
BRECKINRIDGE LT SUSTAINABLE FD		103,585,235	103,924,480
NT EQUITIZATION ACCOUNT		2,847,378	2,851,078
MISSION RELATED INVESTMENTS		6,922,300	6,922,300

TY 2019 Legal Fees Schedule**Name:** ZOMA FOUNDATION INC**EIN:** 81-4630003

Category	Amount	Net Investment Income	Adjusted Net Income	Disbursements for Charitable Purposes
LEGAL FEES	109,987			109,987

TY 2019 Other Expenses Schedule**Name:** ZOMA FOUNDATION INC**EIN:** 81-4630003**Other Expenses Schedule**

Description	Revenue and Expenses per Books	Net Investment Income	Adjusted Net Income	Disbursements for Charitable Purposes
PASS THROUGH-OTHER DEDUCTIONS	614,848	614,848		
PROFESSIONAL MEMBERSHIPS	10,000			10,000
SPONSORSHIPS	19,500			19,500
MISCELLANEOUS	528			528

TY 2019 Other Income Schedule**Name:** ZOMA FOUNDATION INC**EIN:** 81-4630003**Other Income Schedule**

Description	Revenue And Expenses Per Books	Net Investment Income	Adjusted Net Income
SECTION 988 LOSS	-72,514	-72,514	
FX LOSS	-7,688	-7,688	
PASS THRU ORDINARY INCOME (UBTI)	210,244		

Note: To capture the full content of this document, please select landscape mode (11" x 8.5") when printing.

TY 2019 Other
Notes/Loans Receivable
Long Schedule

Name: ZOMA FOUNDATION INC
EIN: 81-4630003

Borrower's Name	Relationship to Insider	Original Amount of Loan	Balance Due	Date of Note	Maturity Date	Repayment Terms	Interest Rate	Security Provided by Borrower	Purpose of Loan	Description of Lender Consideration	Consideration FMV
LANDED DENVER EDUCATION LLC		5,000,000	2,250,000	2018-05	2028-04	FULL PRINCIPAL ON DEMAND AFTER THIRD YEAR	5 %	SECURITY INTEREST IN ASSETS OF BORROWER	PURCHASE LANDED OPTIONS TO RECRUIT EDUCATORS	CASH CASH CASH	2,250,000
TELLURIDE FOUNDATION		1,000,000	1,000,000	2019-03	2026-03	BALANCE DUE AT MATURITY DATE	2 %		SUPPORT THE TELLURIDE LOAN FUND	CASH CASH CASH	1,000,000

TY 2019 Other Professional Fees Schedule**Name:** ZOMA FOUNDATION INC**EIN:** 81-4630003

Category	Amount	Net Investment Income	Adjusted Net Income	Disbursements for Charitable Purposes
CONSULTING FEES	560,994			560,994
INVESTMENT FEES	87,000	87,000		
MANAGEMENT FEES	47,361			47,361

TY 2019 Taxes Schedule**Name:** ZOMA FOUNDATION INC**EIN:** 81-4630003

Category	Amount	Net Investment Income	Adjusted Net Income	Disbursements for Charitable Purposes
NT - FOREIGN TAXES	92,377	92,377		

efile GRAPHIC print - DO NOT PROCESS		As Filed Data -		DLN: 93491318035960	
Schedule B (Form 990, 990-EZ, or 990-PF) Department of the Treasury Internal Revenue Service		Schedule of Contributors ▶ Attach to Form 990, 990-EZ, or 990-PF. ▶ Go to www.irs.gov/Form990 for the latest information.			OMB No. 1545-0047 2019
Name of the organization ZOMA FOUNDATION INC				Employer identification number 81-4630003	

Organization type (check one):

Filers of:	Section:
Form 990 or 990-EZ	☐ 501(c)() (enter number) organization
	☐ 4947(a)(1) nonexempt charitable trust not treated as a private foundation
	☐ 527 political organization
Form 990-PF	☒ 501(c)(3) exempt private foundation
	☐ 4947(a)(1) nonexempt charitable trust treated as a private foundation
	☐ 501(c)(3) taxable private foundation

Check if your organization is covered by the **General Rule** or a **Special Rule**.
Note: Only a section 501(c)(7), (8), or (10) organization can check boxes for both the General Rule and a Special Rule. See instructions.

General Rule

- ☒ For an organization filing Form 990, 990-EZ, or 990-PF that received, during the year, contributions totaling \$5,000 or more (in money or other property) from any one contributor. Complete Parts I and II. See instructions for determining a contributor's total contributions.

Special Rules

- ☐ For an organization described in section 501(c)(3) filing Form 990 or 990-EZ that met the 33¹/₃% support test of the regulations under sections 509(a)(1) and 170(b)(1)(A)(vi), that checked Schedule A (Form 990 or 990-EZ), Part II, line 13, 16a, or 16b, and that received from any one contributor, during the year, total contributions of the greater of (1) \$5,000 or (2) 2% of the amount on (i) Form 990, Part VIII, line 1h, or (ii) Form 990-EZ, line 1. Complete Parts I and II.
- ☐ For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, total contributions of more than \$1,000 *exclusively* for religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals. Complete Parts I, II, and III.
- ☐ For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, contributions *exclusively* for religious, charitable, etc., purposes, but no such contributions totaled more than \$1,000. If this box is checked, enter here the total contributions that were received during the year for an *exclusively* religious, charitable, etc., purpose. Don't complete any of the parts unless the **General Rule** applies to this organization because it received *nonexclusively* religious, charitable, etc., contributions totaling \$5,000 or more during the year ▶ \$ _____

Caution: An organization that isn't covered by the General Rule and/or the Special Rules doesn't file Schedule B (Form 990, 990-EZ, or 990-PF), but it **must** answer "No" on Part IV, line 2, of its Form 990; or check the box on line H of its Form 990-EZ or on its Form 990PF, Part I, line 2, to certify that it doesn't meet the filing requirements of Schedule B (Form 990, 990-EZ, or 990-PF).

Name of organization
ZOMA FOUNDATION INC

Employer identification number
81-4630003

Part I

Contributors (see instructions). Use duplicate copies of Part I if additional space is needed.

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
1	BENJAMIN S WALTON PO BOX 1860 BENTONVILLE, AR 72712	\$ 1,173,031	☐ Person ☐ Payroll ☒ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	☐ Person ☐ Payroll ☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	☐ Person ☐ Payroll ☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	☐ Person ☐ Payroll ☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	☐ Person ☐ Payroll ☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	☐ Person ☐ Payroll ☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	☐ Person ☐ Payroll ☐ Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	☐ Person ☐ Payroll ☐ Noncash (Complete Part II for noncash contributions.)

Name of organization ZOMA FOUNDATION INC	Employer identification number 81-4630003
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Part II Noncash Property			
(a) No. from Part I	(b) Description of noncash property given (see instructions). Use duplicate copies of Part II if additional space is needed.	(c) FMV (or estimate) (See instructions)	(d) Date received
1	CONVERTIBLE NOTE	\$ 1,173,031	2019-09-05
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions)	(d) Date received
-		\$	

Name of organization ZOMA FOUNDATION INC	Employer identification number 81-4630003
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Part III

Exclusively religious, charitable, etc., contributions to organizations described in section 501(c)(7), (8), or (10) that total more than \$1,000 for the year from any one contributor. Complete columns (a) through (e) and the following line entry. For organizations completing Part III, enter the total of exclusively religious, charitable, etc., contributions of \$1,000 or less for the year. (Enter this information once. See instructions.) ▶ \$

Use duplicate copies of Part III if additional space is needed.

(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
(e) Transfer of gift			
Transferee's name, address, and ZIP 4		Relationship of transferor to transferee	
(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
(e) Transfer of gift			
Transferee's name, address, and ZIP 4		Relationship of transferor to transferee	
(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
(e) Transfer of gift			
Transferee's name, address, and ZIP 4		Relationship of transferor to transferee	
(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held
(e) Transfer of gift			
Transferee's name, address, and ZIP 4		Relationship of transferor to transferee	

ZOMA FOUNDATION
Form 990-PF
FEIN: 81- 4630003
December 31, 2019

PART IV, CAPITAL GAINS AND LOSSES FOR TAX ON INVESTMENT INCOME

	DESCRIPTION	DATE ACQUIRED	DATE SOLD	COST	PROCEEDS	NET GAIN/(LOSS)
NT - BRECKENRIDGE LTD GOVT FUND	CAPITAL GAIN (LOSS)	VARIOUS	VARIOUS	24,250,034	24,434,013	183,979
NT - CSTM GL ESG FUND	CAPITAL GAIN (LOSS)	VARIOUS	VARIOUS	1,623,624	1,609,482	(14,142)
NT - CSTM GL ESG FUND	CAPITAL GAIN DISTRIBUTION	VARIOUS	VARIOUS	-	2,780	2,780
NT - CASH EQUITIZATION	SECTION 1256	VARIOUS	VARIOUS	-	815,851	815,851
PART 1, COLUMN A, LINES 6a & 6b				25,873,658	26,862,126	988,468