

## **Joint Venture Policy Guitars Not Guns**

This Joint Venture Policy describes the circumstances under which Guitars Not Guns will enter into a “joint venture”; i.e. any arrangement such that Guitars Not Guns and any other legal entity share the benefits and any burdens of an economic activity. This includes, but is not limited to, interests in joint ownership of all types, express or implied partnerships, limited liability companies, privately-held corporations and contractual arrangements. This does not include, however, interests in publicly-held corporations or publicly-traded debt instruments. Nor does it include arrangements with any organization that either controls or is controlled by Guitars Not Guns, either directly or indirectly.

### **Presumption Against Joint Ventures**

In general, Guitars Not Guns will refrain from entering into joint ventures of any type with any party, regardless of whether the other party is a for-profit entity or a non-profit entity and/or tax-exempt entity. Guitars Not Guns will enter in joint ventures only in rare circumstances and pursuant to this policy.

### **Requirement of Legal Opinion**

It is recognized that the law governing joint ventures involving tax exempt organizations such as Guitars Not Guns is fluid, complex and sometimes controversial. Therefore this policy cannot provide sufficient guidance for all situations. Accordingly, if despite the presumption against joint ventures, the Board of Directors of Guitars Not Guns determines that there is sufficient reason to enter into a joint venture, Guitars Not guns shall first obtain a written opinion from legal counsel concluding that it is more likely than not doing so does not violate any provision of the Internal Revenue Code, any Treasury Regulation, or any valid legal ruling, announcement, interpretation or position promulgated by the Internal Revenue Service.