

# *Mergers, Acquisitions, Diversifications, Restructurings, and/or Die-Offs in the Conservation Movement*

by Andy Kerr

≈ from



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**T**HE NONPROFIT conservation movement needs to follow examples in the for-profit world and do some serious merging, acquiring, consolidating, upsizing, downsizing, bankrupting, resizing, and reinventing.

The most compelling reason that should force the conservation movement to consider such radical changes is a general lack of success. Yes, we have small victories, sometimes even major ones. However, by almost any measure, the health of Earth's natural and human communities continues to worsen.<sup>1</sup>

It may be that restructuring the conservation movement to become more efficient<sup>2</sup> will not be enough to overcome the greed, ignorance, stupidity, and genetics that seemingly make a critical mass of humans behave in ways that are destructive to the health of themselves, their families, their heirs, their watersheds, their bioregions, and their planet. Given that the outcome is so important, the conservation movement must consider all options.<sup>3</sup>

The bursting of the latest stock market bubble in 2002, and the subsequent decline in foundation funding, provides the opportunity—if not the necessity—for conservation organizations to consider restructuring. Some will merge, some acquire, some diversify, some restructure, and some will die. Those who think the fundraising will improve in the near future should heed the words of Denise Joines, a program officer for the Wilburforce Foundation in Seattle:

Foundation dollars for the environment are at the lowest level in the past ten years, and current projections for most foundations indicate funding amounts are likely to stay at this level or may even be lower in 2004. If you've been hoping for foundation funding to improve next year, please rethink your fundraising strategies now.<sup>4</sup>

Below are 18 issues for organizations (board members, chief executive officers, and staff) and funders (foundations, large donors, and members) to consider as they ponder their place in these challenging times. A discussion of mergers and acquisitions follows.

### 1. Optimum size for an organization

The rule of thumb for an optimal size of a nonprofit organization is that there is no rule of thumb. Just as in business, there is no simple cookbook answer; the right size depends on the group's mission, goals, culture, and other factors.

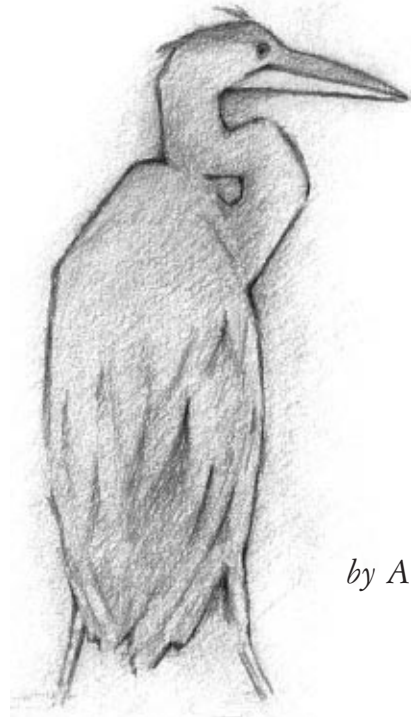
When it had annual revenues of approximately \$100 million, owned its own calendar printing company, tried to self-

insure for employee health care (and found out how expensive one heart transplant and one brain tumor could be), and had a building it could not afford, the behemoth National Wildlife Federation was neither sustainable nor efficient.

Conversely, an organization with a budget of less than \$100,000 that relies on employees who will work for below a living wage (or nothing) and without health insurance, that maybe pays "gas" but certainly not the IRS mileage rate, is an organization far too small to be efficient or sustainable.

A one-person organization never has staff meetings. Add employees to get more work done and staff meetings become inevitable. Though staff meetings take staff time, they can make the staff more efficient in their remaining time. However, add too many employees and too much time may be wasted in staff meetings.

## Mergers, Acquisitions, Diversifications,



*by Andy Kerr*

An organization of adequate size allows for specialization among the staff that begets greater efficiency. Shortly after its founding, the organization that became the Oregon Natural Resources Council was simply four zealots who needed stationery. They dealt with financial challenges by severely lowering their income and only stopping their program work to raise money when the money was gone. Eventually, they figured out they needed someone (and not one of them) to be in charge of raising money. By adding 25% to their staff, they raised 60% more money in the first year.

An organization can evolve into a stable institution without becoming a large bureaucracy. Of course, while attention must be given to minimizing bureaucracy, it must be remembered that some level of “bureaucratic” organization means that money is raised, paychecks are cut, telephones ring, and

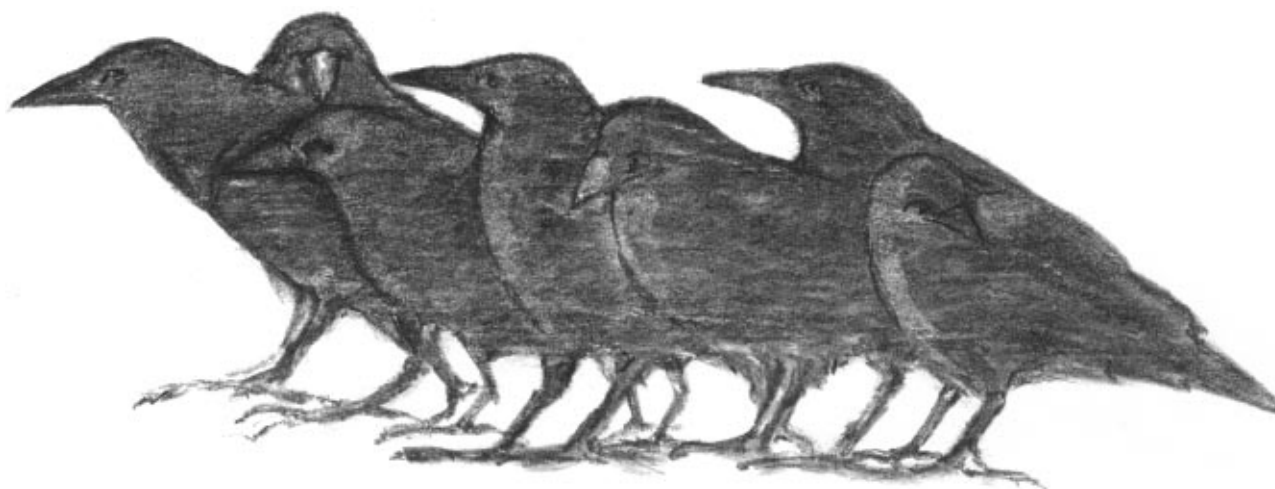
computers work. The question of optimum size should always be on the table for an organization to consider. The correct answer is not always “larger than it is now.”

## 2. It is easier to create than sustain

It's too easy for an organization to be created and obtain nonprofit tax-exempt status from the Internal Revenue Service. One of the results is that the conservation movement has too many small nonprofit organizations that are not sustainable.

Ironically, while it is relatively easy to create a nonprofit, tax-exempt organization, it requires going to a special level of hell to fill out the organization's annual tax return (IRS Form 990). In general, there is a high administrative burden that is disproportionate to revenue and expenses for small organizations.

# Restructurings, and/or Die-Offs



## in the Conservation Movement

### 3. Founders aren't necessarily managers

The creative energy of a founder is vital to start an organization. However, it is often the case that the person who starts an organization is not the one to run it after it reaches a certain size. Often, the personality traits (independence, fortitude, determination, dreaminess, stubbornness, etc.) that are vital to start something are not the same as those (leadership, teamship, practicality, flexibility, etc.) necessary to manage an organization. A few founders adapt, most do not.

### 4. Diversification of organizational structure

Organizations that seek to affect public policy by legislative means should first question whether they should exclusively retain their 501(c)(3) status (nonprofit tax-exempt charitable organization) or whether they should also establish a 501(c)(4) (nonprofit social welfare organization). While both kinds of organizations are exempt from federal income tax, only contributions to a (c)(3) are tax-deductible by the giver. Unlike a (c)(3), a (c)(4) has no lobbying limits.

If an organization receives a significant portion of its funds from individual memberships and small contributions, those funds should be plowed into a (c)(4). There is no rational reason to have those funds subject to the absurd lobbying limits of a (c)(3). While foundation money almost always must go to a (c)(3), and most large donors want their contributions to be tax-deductible, most small contributors don't care if their \$50 goes to a (c)(3) or (c)(4).

Of large national conservation organizations, only the Sierra Club fully utilizes this dual structure.<sup>5</sup> In other social change movements, a dual (c)(3)/(c)(4) structure is common.<sup>6</sup>

### 5. Getting political in an electoral kind of way

If the presidency of George H. W. Bush hasn't convinced you that it makes a difference who is in the White House, perhaps nothing can. A (c)(3) organization cannot engage in *any* activity supporting or opposing an candidate for office. A (c)(4) can have an affiliated political action committee (PAC). An unaffiliated PAC can be established that happens to have similar goals and staff and/or board, as long as the money is kept separate.

### 6. Maximization of organizational "lobbying" resources

Many social change organizations have goals that are best—or only—met by changing law to favor their cause. The law currently limits the amount of lobbying (attempting to influence

legislation) that a 501(c)(3) can do. A small (less than \$500,000 in annual expenditures) (c)(3) can spend up to 20% of its expenditures lobbying. Under the law, as overall expenditures increase, the allowable lobbying percentages decrease. Organizations with \$3 million, \$5 million, and \$10 million of expenditures can spend a maximum of \$300,000, \$400,000, and \$650,000 respectively (10%, 8%, and 6.5% of their respective expenditures).

If an organizational goal is to maximize lobbying expenditures within their (c)(3) limitations, the largest an organization should be is \$17 million of annual expenditures. The law has an absolute limit of \$1 million being spent annually by (c)(3) organizations on lobbying. At \$17 million in expenditures, this \$1 million equates to 5.8% of organizational resources. If you are the National Wildlife Federation with expenditures of \$110,750,496 million in 2002, the limit is still \$1 million (0.9% of actual expenditures). If that nearly \$111 million were spread among seven organizations, the total amount of money that could be spent on lobbying would be nearly \$7 million.

Congress imposes no limits on the amount of money a for-profit corporation may spend lobbying.

### 7. Maximization of movement "lobbying" resources

If a goal of the conservation movement is to maximize the money that can go to lobbying, then that same \$17 million should be spread among 34 organizations with expenditures of \$500,000 each. In this case, rather than a total of \$1 million being allowed for lobbying, a total \$3.4 million can be used (20% of \$500,000 times 34). The question naturally arises—is there more bang for the buck (efficiency) with 34 organizations spending \$100,000 each, or one organization spending \$1 million? The answer depends on if some or all of the 34 organizations pool their funds. If history is any guide, that won't happen.

Such is the perversity of the IRS tax law. In general, Congress limits those large organizations who choose to limit themselves to be solely a 501(c)(3) entity from spending much of their money on lobbying.

### 8. Grassroots lobbying limitation

An additional IRS limitation is that no more than 25% of whatever amount is spent on "lobbying" can be spent for "grassroots" (encouraging the public—but *not* an organization's members—to contact elected officials) lobbying. So, in

the case of the National Wildlife Federation, assuming it reaches its maximum allowable lobbying expenditure at \$1 million, not more than \$250,000 can be spent urging the public to take action on a legislative issue. In fact, in 2002, NWF did not reach the allowable lobbying threshold, spending \$371,314, of which only \$55,518 was “grassroots” lobbying (urging non-members to support or oppose legislation).<sup>7</sup>

Congress doesn't really want nonprofit, tax-exempt organizations informing the public, especially about legislation. Apparently, neither do 501(c)(3) conservation organiza-

tions, as few achieve their annual lobbying limit. NWF is not unique in this regard. No wonder the conservation movement is often accused of talking mostly to itself.

## 9. Organizational sustainability

While sustainability in running an economy or a planet is paramount, it may not be the case in running an organization, whether for-profit or nonprofit. If the goal of the organization is to provide long-term social service, then sustainability is necessary. However, a nonprofit organization with a specific social

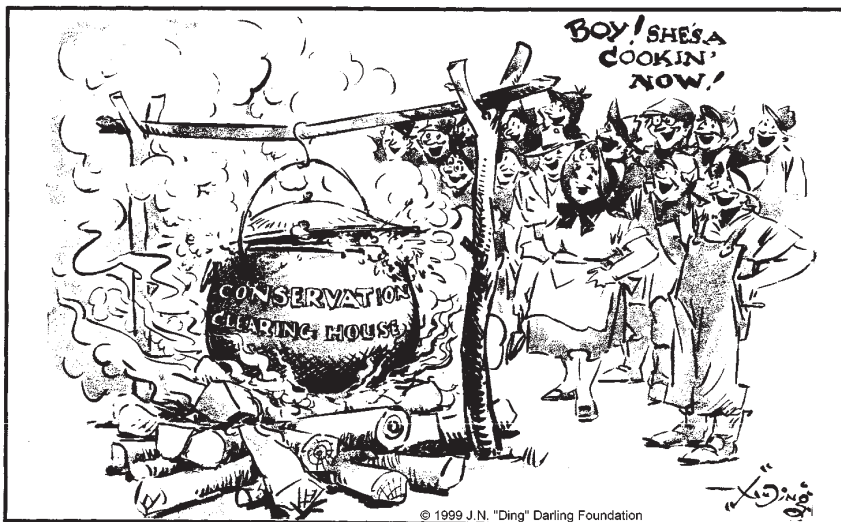
change goal may choose to go out of business when the goal is met. The Wolf Fund, for instance, after working for a decade to have wolves reintroduced to Yellowstone, shut down when that milestone was reached. Such examples are rare though. More typical is the March of Dimes, which, after polio was eradicated, converted itself to oppose birth defects, a plethora of maladies that will probably never be completely eradicated.

## 10. Endowments may not be a good thing

Every nonprofit's executive director dreams of an endowment or a larger endowment. Harvard University doesn't start any program unless it is fully endowed. The upsides of endowments are obvious: dedicated and (hopefully) stable money to carry out the work. However, endowments also have downsides. With an adequate endowment, an organization can live forever, even if it has long since become ineffective in its mission. The Izaak Walton League of America was a powerful force in American conservation in the middle of the twentieth century. It is not today. However, over time, enough of its membership provided for the organization in their wills, so that it continues on life support—even with declining membership and donor bases.



*It is hard to start a fire with one stick of wood*



*But...if you could ever get the fire wood together in one pile...*

In the 1930s, cartoonist Ding Darling promoted the advantages of a collective effort for conservation; his work sparked the formation of the National Wildlife Federation.

## 11. Reducing overlap

In the Oregon portion of the Klamath-Siskiyou bioregion where I live, there are four smallish (c)(3) organizations that work

to conserve and restore the area's forests and watersheds. Overlap is most obvious on the administrative and fundraising sides. All these groups ask the same foundations for money, seek money from overlapping pools of donors, have overlapping memberships, file IRS 990 tax returns, keep records, and do payroll.

Working essentially on the same landscape, these organizations all face great challenges. I have been to public meetings where all four groups sent at least one staff person. I did not perceive the quadruple coverage having four times the effect on government policy.

Overlap is less obvious on the program side. In conservation, the work is endless; there is always more that could be done with more time, people, and money. These four organizations, by practice and turf, usually allocate the work by one organization taking the lead and the others following. However, all these organizations put out newsletters (all could be better), serve as plaintiffs (often in the same lawsuits), educate (often the same targets), lobby (the same officials), challenge timber sales and other developments (often the same ones), and do community outreach (to the same media, civic leaders, etc.).

To add to the competitive mix, there are also several volunteer-run groups and a local office of the largest conservation organization in the world. In the California portion of the bioregion, several additional California organizations also overlap with these Oregon groups.

## **12. Reducing underlap**

Even though the conservation movement often has numerous organizations overlapping on issues, it still has cases of severe underlap. It stands to reason that if the conservation movement becomes more efficient, and becomes more effective on the issues that it is working on, it can take on additional issues.

## **13. Forward, not backward, downsizing**

As an organization grows, by raising more money and hiring people, it does more. Growth follows either stated or assumed priorities—but usually the latter. The first staff person does the highest priority thing, the next staff person hired does something that may be as important, but a slightly lower priority, and so on. In times of retrenching, an organization tends to contract in exactly the opposite direction it expanded. There are multiple reasons for this, including adherence to seniority (last hired, first fired), relative power of senior staff, etc. However, organizations facing contraction should think hard about what is important today (or will be tomorrow), and

not be unduly constrained by what was important earlier. It may well be that an organization's newer activities are more important than what it has traditionally done.

## **14. Simultaneous need for, lust for, and fear of growth**

An organization may need to grow to achieve sustainability. Some organization leaders (board and staff) may seek growth because it means bigger budgets and bigger staffs to get the work done. Other leaders, especially if they are founders, may fear growth because it might mean a loss of relative power and/or a changing institutional culture.

## **15. For every rule there are always exceptions**

In general, the conservation movement has too many very small and very large organizations. However, in some cases, it is wise to start a new institution. If the issue is new and different enough from other issues, if the underlap is so great that it is clear that it's not just a matter of making existing institutions more efficient to be able to fill the gaps, then a new organization may be the best option.

## **16. Organizational imperative: landscape/resource or strategy/tactics**

How an organization views itself can be unduly limiting. In general, organizations define themselves either by their tactics or their issue.

If the reason for creating an organization is a specific issue (overpopulation, wildlife movement corridors); a particular piece or kind of landscape (Tongass National Forest, national forests, forests); one or more species (monarch butterflies, marine mammals); a particular resource (air, water, soil); or particular pollutants (nuclear radiation, pesticides, persistent organic pollutants), then the organization should be willing to embrace a range of tactics that further their aims for their issue, always keeping in mind that as an issue evolves, different tactics are necessary for success.

If the reason for creating an organization is centered on tactics (litigation, legislation, civil disobedience, corporate cooperation, education, administrative advocacy), then it must be willing to pick up an issue when its expertise is the needed tactic, and drop an issue when other tactics are necessary.<sup>8</sup>

## **17. What for art thou coalition?**

If composed of organizations with diverse interests allied to achieve a specific political goal, coalitions are good. Coalitions

consisting primarily of organizations with the same general interests working on the same issues is indicative of organizational overlap.

If numerous groups are working on an issue, coordination is necessary for greatest effectiveness. However, if too many organizations are working on the issue, a good deal of time and resources must be spent on external coordination, often trying to resolve differences in goals, strategies, tactics, and techniques—the very differences that define and justify multiple organizations.

Coordination is generally a good thing, but not if it is simply to mitigate fundamental movement inefficiencies due to an excessive number of small or large unsustainable organizations.

### 18. Leaders versus managers

Is your organization dominated by leaders or managers? While not mutually exclusive, the two types tend toward opposite characteristics, as shown below. Any functioning organization needs both, and more of one than the other at different times in its evolution.

FACTOR	LEADERS	MANAGERS
Risk	Accept	Avoid
Vision	Long-Term	Short-Term
Worldviews	More Than One	One
Definition of Success	A Great Thing Occurred	A Bad Thing Avoided
Strategic Plans	Create	Implement
Handling Swamps <sup>9</sup>	Drain	Fight the Alligators

### Mergers and acquisitions

Mergers and acquisitions are common in the for-profit world, but rare in the nonprofit world. In a merger, two firms determine that they may be more profitable by merging—sharing costs, resources, customers, etc., and thus achieving efficiencies of scale. In a merger, the culture of two companies are combined. Acquisitions, on the other hand, are where one firm merely absorbs the assets (and usually liabilities) of the other. The culture of the smaller organization is less likely to survive in an acquisition.

Historically, in the nonprofit world, mergers and acquisitions are rare. There are probably many reasons, but one is that

by the time organizations get serious about considering a merger or acquisition, usually the liabilities of one of the organizations far exceeds its assets.

In considering and implementing an acquisition or a merger of two or more groups, there are no hard and fast rules. Each potential merger or acquisition is very fact-specific. Due diligence requires all factors to be considered, and that things be talked out (but not talked to death). Below are some suggestions to consider.

**CONFIRM WANT.** All affected entities must “want” a merger or acquisition. “Want” in this case may be defined as “realizing that there is no other choice.” While all affected entities (the organizations considering the option) have to want a merger or acquisition, all affected parties (staff, board, donors, volunteers, etc.) do not all have to agree (see “Factor Who” below).

**DEFINE WHY.** Why merge? Make a list. Be frank. Organization A is failing or has failed. Organization B is displacing or has displaced Organization A. The work of A and B could be better done together. Is A buying (or buying back lost) market share? Is A buying out the competition?

**ACCESS WHAT.** What is to possibly be merged? Make a list of assets and liabilities for all entities. The realm of assets generally worth acquiring from another organization is usually:

- > good name;
- > supporter/activist lists;
- > staff;
- > old furniture and obsolete computers.

Liabilities might include:

- > institutional baggage;
- > dysfunctional staff;
- > incompetent board;
- > burned-out founder;
- > debt;
- > old furniture and obsolete computers.

**DETERMINE HOW.** Will organization A absorb B? In total, or just staff and mailing list? Will A become an identifiable project of B? Will A and B form a new C?

**FACTOR WHO.** The *who* is often the most difficult factor. Most nonprofit organizations in need of merging or acquisition are supported and driven by powerful individual personalities. Usually employees, they are not interchangeable cogs in a machine of a huge organization. These individuals tend to be either essentially the entire organization or one of the key factors that makes the organization work.

These individuals, because they work very hard and/or are very good at what they do, hold great power in an organization—sometimes more power than is healthy. A key individual can be both an organization's greatest asset and greatest liability. It is when the latter outweighs the former, but the organization is paralyzed by a fear of change and the unknown, that organizations decline.

Other staff, though not individually key, can be collectively so. Most people who work in nonprofits are not doing it for the money. They believe in a cause so much that they are

willing to work harder and for less money because of other rewards they receive, including a feeling of doing good.

Mergers and acquisitions usually mean downsizing. That's where the efficiencies occur. Generally, not all program and development staff are needed or affordable. Definitely, not all administrative staff are needed. Certainly, not all board members are needed.

In any merger or acquisition, some staff and/or board have to either downsize themselves or be taken out of the game. This is probably the number one reason that more mergers and

## Growth of Environmental Nonprofit Organizations

According to Internal Revenue Service data, there were 1,802 "environmental" organizations (very broadly defined) in 1990. By 1998, the number had increased 123% to 4,018. In contrast, the growth rate for all nonprofit organizations was 59%.

Total assets held by environmental nonprofits increased from \$3.3 billion in 1990 to \$7.9 billion in 1998 (\$6.3 billion in 1990 dollars). However, mean assets declined 13% and median assets declined 29%, adjusted for inflation. In contrast, these numbers were 9% up and 19% down respectively for all nonprofits.

Annual contributions to environmental nonprofits increased 82% from \$0.8 billion in 1990 to \$1.5 billion (inflation-adjusted) in 1998. Contributions for all nonprofits increased only 52%. Both mean and median contributions to environmental nonprofits declined by 21%. In contrast, the decline was 4% and 24% respectively for all nonprofits.

Dues, as a part of contributions, declined 17% from \$102.1 million in 1990 to \$85.9 million (inflation-adjusted) for environmental nonprofits. Among all nonprofits, dues collection increased 21%.

During the 1990s, as in the rest of society, the rich nonprofits got richer and the poor didn't (as evidenced by the general decline in mean and median numbers, while overall numbers generally increased). In 1998, the top 100 environmental organizations held 71% of that \$7.9 billion in assets. The remaining 97.5% of the environmental organizations held the remaining 29% of the assets.

By *assets*, the five largest environmental nonprofits in 1998 were:

- ▶ The Nature Conservancy (\$1.6 billion in assets)
- ▶ Puerto Rico Conservation Trust (\$605.3 million)
- ▶ Trust for Public Land (\$198.8 million)
- ▶ New York Botanical Garden (\$173.4 million)
- ▶ Massachusetts Audubon Society (\$142.1 million)

The only environmental nonprofit organization to rank in the top 100 nonprofits was the Nature Conservancy, coming in at 49th overall.

By *annual contributions*, the five largest environmental nonprofits in 1998 were:

- ▶ The Nature Conservancy (\$235 million in contributions)
- ▶ Trust for Public Land (\$80.8 million)
- ▶ New York Botanical Garden (\$36.2 million)
- ▶ Tides Center (\$29.8 million)
- ▶ Save the Redwoods League (\$28.5 million)

Again, only TNC made the top 100 among all nonprofits, coming in at 47th in contributions.

By *dues collection*, the five largest environmental nonprofits in 1998 were:

- ▶ National Audubon Society (\$10 million in dues)
- ▶ National Arbor Day Foundation (\$9.2 million)
- ▶ Urban Land Institute (\$4.5 million)
- ▶ Appalachian Mountain Club (\$3.1 million)
- ▶ Water Environment Federation (\$2.8 million)

—Andy Kerr

acquisitions don't occur in the nonprofit world. In the for-profit world, workers are viewed as a cost of doing business; in the nonprofit world, workers are the reason for being in business—to get the work done.

Nonprofit employees are mostly loved and respected, if not revered and/or feared. It is the culture of a nonprofit to be more fair than profitable (powerful). A for-profit values fairness less than profit and only to the degree that being unfair limits profit.

**DECIDE WHERE.** Location is often a consideration. Will A, now a project of B, be housed in the same location, or will A have to move?

**CHOOSE WHEN.** Timing is usually easy to determine, after the other questions have been answered. It may be after one or more events have occurred, such as retirement of a key staff person, the money has run out, etc.

THE CONSERVATION MOVEMENT, especially its public lands component, is comprised of too many small groups organized on the Somalian warlord model—having enough resources to be players, but not enough to win. Only by allying with other warlords do they have a chance of achieving their goals. A pack of cooperating warlords does not an army make.

The result is that too many organizations working on the same issues are trying to raise money, comply with administrative requirements, and do the noble work of saving the world. Mergers and/or acquisitions can achieve economies of scale and increased efficiencies (reduction of

overlap and underlap). Money can be more efficiently raised, health insurance costs can be lowered, resources more effectively marshaled, etc. In times of declining foundation monies, such actions can mean that the same work can be done. In times of more monies, such actions means that even more work can be done.<sup>10</sup>

Merging is painful, perhaps especially so for organizations populated by Darwinian adherents who place great stock in the concept of the survival of the fittest (or at least of the least wounded). When the Darwinian type is also a founder who is fundamentally a contrarian—and additionally doesn't want his or her fiefdom disturbed—the prospects for merger are slim to none.

In these tight financial times, some conservation nonprofits have already died. Undoubtedly, more will do so. Merging can be a way for some organizations to die and be reborn so the important work can continue, even if under a different name or structure.

The only thing more difficult than merging may be—  
not merging. ☹

*Since starting his conservation career during the Ford Administration, Andy Kerr (www.andykerr.net) has run a largish small nonprofit organization, started others, consulted for some very large and very small ones, served on the boards of others, and directed projects under the umbrella of another. He is now Czar of The Larch Company, a for-profit, non-membership conservation organization that represents human generations yet unborn and species that cannot talk, where all profits are dedicated to conservation.*

## NOTES

1. The literature on ecological destruction and despair is, unfortunately, voluminous. One overview of the trends of environmental conservation is Chris Bright et al. (Worldwatch Institute), 2003, *State of the World* (New York: W.W. Norton).
2. "Efficiency" in the for-profit world equates to profit; in the nonprofit world to power ("effectiveness" for those conservationists uncomfortable with power).
3. My comparison of the for-profit and nonprofit worlds here is limited to efficiency. Such comparisons should not be construed as endorsement of the for-profit sector's sustainability, equity, or justice.
4. Denise Joines, 2003, A Note from the Wilburforce Foundation (email to grantees), September 16.
5. In the early 1960s the IRS revoked the 501(c)(3) charitable status of the Sierra Club, which converted to a 501(c)(4) social welfare organization. While David Brower lost his job as executive director for buying full-page ads in the *New York Times* to oppose Congressional funding of dams in the Grand Canyon (it worked!), the Sierra Club soon formed a new companion (c)(3), the Sierra Club Foundation. At that time any "lobbying" by a (c)(3) was illegal. The law now allows (c)(3)s to lobby, but under severe limits. The government revocation of the Sierra Club's charitable (c)(3) status is probably the single most important factor in making it the most political-powerful conservation organization in the United States.
6. For more information, see Andy Kerr and Sally Cross, 1996, Let's Get Political, *Wild Earth* 6(1) Spring: 72–74. The Alliance for Justice (www.allianceforjustice.org) has numerous publications on how to maximize legislative lobbying within the bounds of the (c)(3) law.
7. Eileen Morgan Johnson, 2003 (General Counsel, National Wildlife Federation), pers. comm, August 12.
8. Andy Kerr, 1995, It's Not Either/Or; It's All or Nothing, *Wild Earth* 5(1) Spring: 42–44.
9. The author would happily entertain an ecologically correct alternative to this metaphor rooted in history and therefore widely understood.
10. Much of what I have said here about nonprofit social change organizations is equally applicable to the charitable foundations that fund them. Among the additional challenges and opportunities facing foundations is that money both makes and allows people to be weird. Stir in issues found in most families, but now amplified by wealth, and it can be an awful situation. A few years ago, a major environmental grantmaker, the W. Alton Jones Foundation, self-destructed. Family factions grew over time, and a divorce catalyzed the break-up. Often, the passing of a patriarch or matriarch means a change in focus for the foundation. However, a general critique of foundations by this author would be biting the mammary that suckles him.