** PUBLIC DISCLOSURE COPY **

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Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Open to Public Inspection

OMB No. 1545-0047

Department of the Treasury Internal Revenue Service

▶ Do not enter social security numbers on this form as it may be made public. ► Go to www.irs.gov/Form990 for instructions and the latest information.

AUG 1, 2017 and ending JUL 31, A For the 2017 calendar year, or tax year beginning Check if applicable: C Name of organization D Employer identification number Address change PALO ALTO UNIVERSITY, INC. Name change 94-2340692 Doing business as Initial return Number and street (or P.O. box if mail is not delivered to street address) Room/suite E Telephone number Final return/ 800-818-6136 1791 ARASTRADERO ROAD termin-ated 33,334,749. City or town, state or province, country, and ZIP or foreign postal code **G** Gross receipts \$ Amended return PALO ALTO, CA 94304 H(a) Is this a group return Applica-F Name and address of principal officer: MAUREEN O'CONNOR Yes X No for subordinates? pending SAME AS C ABOVE H(b) Are all subordinates included? Yes Tax-exempt status: X = 501(c)(3) 501(c) () ◀ (insert no.) 4947(a)(1) or If "No," attach a list. (see instructions) J Website: WWW.PALOALTOU.EDU **H(c)** Group exemption number ▶ **K** Form of organization: **X** Corporation Association Other > L Year of formation: 1975 M State of legal domicile: CA Part I Summary Briefly describe the organization's mission or most significant activities: TO PROVIDE UNDERGRADUATE AND Activities & Governance GRADUATE LEVEL EDUCATION IN THE FIELD OF PSYCHOLOGY. Check this box if the organization discontinued its operations or disposed of more than 25% of its net assets. 23 Number of voting members of the governing body (Part VI, line 1a) 23 Number of independent voting members of the governing body (Part VI, line 1b) 497 5 Total number of individuals employed in calendar year 2017 (Part V, line 2a) <u>30</u> Total number of volunteers (estimate if necessary) 6 0. 7 a Total unrelated business revenue from Part VIII, column (C), line 12 7a 7,202. b Net unrelated business taxable income from Form 990-T, line 34 **Prior Year** Current Year 1,006,612. 1,030,443. Contributions and grants (Part VIII, line 1h) Revenue 30,226,460. 31,631,295. Program service revenue (Part VIII, line 2g) 58,095. 142,014. Investment income (Part VIII, column (A), lines 3, 4, and 7d) 10 126,623. 442. Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e) 31,417,790. 32.804.194. Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12) 991,322. 1,000,718. Grants and similar amounts paid (Part IX, column (A), lines 1-3) 0. 0. Benefits paid to or for members (Part IX, column (A), line 4) 18,395,271. 19,257,297. Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10) Expenses 16a Professional fundraising fees (Part IX, column (A), line 11e) **b** Total fundraising expenses (Part IX, column (D), line 25) 9,633,927. 10,308,688. Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e) 29,029,916. 30,557,307. Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25) 2,246,887. 2,387,874. Revenue less expenses. Subtract line 18 from line 12 Beginning of Current Year **End of Year** 30,623,070. 28,236,667. 20 Total assets (Part X, line 16) 11,744,293. 12,067,863. 21 Total liabilities (Part X, line 26) 16,492,374. 18,555,207. Net assets or fund balances. Subtract line 21 from line 20 Part II | Signature Block 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 officer) is based on all information of which preparer has any knowledge. Signature of officer Date Sign JUNE KLEIN, VP BUSINESS AFFAIRS & CFO Here Type or print name and title PTIN Date Print/Type preparer's name Preparer's signature MAGA E. KISRIEV P01008919 Paid Firm's name HOOD & STRONG LLP 94-1254756 Preparer Firm's EIN Firm's address > 275 BATTERY ST, STE 900 Use Only Phone no. 415.781.0793 SAN FRANCISCO, CA 94111

X Yes No

May the IRS discuss this return with the preparer shown above? (see instructions)

Form **8868**

(Rev. January 2017)

Department of the Treasury Internal Revenue Service

Application for Automatic Extension of Time To File an Exempt Organization Return

File a separate application for each return.

▶ Information about Form 8868 and its instructions is at www.irs.gov/form8868 .

OMB No. 1545-1709

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/efile, click on Charities & Non-Profits, and click on e-file for Charities and Non-Profits.

Automatic 6-Month Extension of Time. Only submit original (no copies needed).

All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.

must ı	use Form 7004 to request an extension of time to file income	e tax retui	ns.					
				Enter filer's identifying number				
Туре	Name of exempt organization or other filer, see instruc	ctions.		Employer identification number (EIN) or				
print			04 2240602					
File by t	PALO ALTO UNIVERSITY, INC.	94-2340692						
due date		Social se	(SSN)					
return. S instructi	ee	roign add	ross, soo instructions					
	PALO ALTO, CA 94304	neigh add	ress, see instructions.					
Enter	the Return Code for the return that this application is for (file	e a separa	te application for each return)			0 1		
Applic	eation	Return	Application			Return		
ls For		Code	Is For			Code		
Form 9	990 or Form 990-EZ	01	Form 990-T (corporation)			07		
Form 9	990-BL	02	Form 1041-A			08		
Form 4	1720 (individual)	03	Form 4720 (other than individual)			09		
	990-PF	04	Form 5227	10				
	990-T (sec. 401(a) or 408(a) trust)	05	Form 6069			11		
Form 990-T (trust other than above) 06 Form 8870 JUNE KLEIN						12		
• The books are in the care of > 1791 ARASTRADERO ROAD - PALO ALTO, CA 94304								
	ephone No. 800-818-6136	10 1102	Fax No. ► 650-433-38		<u> </u>			
	ne organization does not have an office or place of business	in the I Ir						
	nis is for a Group Return, enter the organization's four digit (up, check this		
box 🕨			ch a list with the names and EINs of					
1	request an automatic 6-month extension of time until		- 1 F 0 0 1 0		pt organization			
	for the organization named above. The extension is for the o	organizatio	on's return for:					
	calendar year or							
			d ending JUL 31, 2018		<u> </u>			
2	If the tax year entered in line 1 is for less than 12 months, cl	heck reas	on: L Initial return L I	Final retur	n			
	Change in accounting period							
	If this application is for Forms 990-BL, 990-PF, 990-T, 4720,	or 6069,	enter the tentative tax, less any	3a		0.		
	nonrefundable credits. See instructions. If this application is for Forms 990-PF, 990-T, 4720, or 6069.	onter en	\$					
	estimated tax payments made. Include any prior year overp			3b	\$	0.		
	Balance due. Subtract line 3b from line 3a. Include your pa			- 35	Ψ			
	by using EFTPS (Electronic Federal Tax Payment System). S	•	• • •	3с	\$	0.		
	by using Entro (Electronic rederal fax Payment System). See instructions.							

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-EO and Form 8879-EO for payment instructions.

LHA For Privacy Act and Paperwork Reduction Act Notice, see instructions.

Form 8868 (Rev. 1-2017)

1	Briefly describe the organization's mission:

ENGAGING MINDS AND IMPROVING LIVES LOCALLY AND GLOBALLY THROUGH INNOVATIVE EDUCATION.

- Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? If "Yes," describe these new services on Schedule O. If "Yes," describe these changes on Schedule O.
- Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.
- 5,634,653. including grants of \$ 493,942.) (Revenue \$ 15,902,993.) 4a (Code:) (Expenses \$ PH.D. CLINICAL PSYCHOLOGY:

THE UNIVERSITY HAS OFFERED A FIVE-YEAR ONSITE DOCTORAL PROGRAM IN CLINICAL PSYCHOLOGY, LEADING TO A DOCTOR OF PSYCHOLOGY (PH.D.) SINCE 1975. THE PH.D. PROGRAM WAS ACCREDITED BY THE AMERICAN PSYCHOLOGICAL ASSOCIATION (APA) IN 1988 AND WAS RE-ACCREDITED IN 2016 BY APA FOR SEVEN YEARS.

DURING THE 17-18 ACADEMIC YEAR, THIS PROGRAM WELCOMED A NEW COHORT OF 81 STUDENTS, GRADUATED 51 STUDENTS, AND EXPERIENCED 12 WITHDRAWALS OF THE 467 STUDENTS IN THE PROGRAM (2.5% ATTRITION). ADDITIONAL OUTCOMES DATA IS REPORTED ANNUALLY TO WASC, THE DEPARTMENT OF EDUCATION, THE

4,940,380. including grants of \$ 284,700.) (Revenue \$) (Expenses \$ (Code: PSY.D. CLINICAL PSYCHOLOGY:

THE UNIVERSITY OFFERS A FIVE-YEAR ONSITE DOCTORAL PROGRAM IN CLINICAL PSYCHOLOGY, LEADING TO A DOCTOR OF PSYCHOLOGY DEGREE (PSY.D). THIS PROGRAM IS IMPLEMENTED IN COLLABORATION WITH THE STANFORD SCHOOL OF MEDICINE DEPARTMENT OF PSYCHIATRY AND BEHAVIORAL SCIENCES, AND WAS APPROVED BY WASC IN 2002. THE PROGRAM, THE PGSP-STANFORD PSY.D. CONSORTIUM, WAS FIRST ACCREDITED BY APA IN 2006, RE-ACCREDITED IN 2013 BY APA FOR SEVEN YEARS, AND CURRENTLY PREPARING FOR ITS NEXT APA SELF-STUDY.

DURING THE 17-18 ACADEMIC YEAR, THIS PROGRAM WELCOMED A NEW COHORT OF 1,970,101. including grants of \$ 0. (Revenue \$ 4c (Code:) (Expenses \$ THE GRONOWSKI CENTER:

THE GRONOWSKI CENTER IS A PSYCHOLOGY TRAINING CLINIC DEDICATED TO PROVIDING COMPASSIONATE COUNSELING, PSYCHOTHERAPY AND ASSESSMENT SERVICES TO ADULTS, OLDER ADULTS, COUPLES, ADOLESCENTS, CHILDREN AND FAMILIES IN SANTA CLARA COUNTY AND SAN MATEO COUNTY.

THE CLINIC OFFERS SERVICES ON A SLIDING SCALE BASIS AS A PART OF ITS COMMUNITY MISSION. SERVICES ARE PROVIDED BY DOCTORAL LEVEL PSYCHOLOGY STUDENTS UNDER THE SUPERVISION OF LICENSED PSYCHOLOGISTS.

Other program services (Describe in Schedule O.)

11,609,415 • including grants of \$ 212,680.) (Revenue \$ 9,022,614.)

24,154,549. Total program service expenses ▶

Part IV Checklist of Required Schedules

			Yes	No
1	Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)?			
	If "Yes," complete Schedule A	1	Х	
2	Is the organization required to complete Schedule B, Schedule of Contributors?	2	Х	
3	Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for			
	public office? If "Yes," complete Schedule C, Part I	3		X
4	Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect			
	during the tax year? If "Yes," complete Schedule C, Part II	4		X
5	Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or			
	similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III	5		X
6	Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to			
	provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I	6		X
7	Did the organization receive or hold a conservation easement, including easements to preserve open space,			
	the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II	7		X
8	Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III	8		х
9	Did the organization report an amount in Part X, line 21, for escrow or custodial account liability, serve as a custodian for			
	amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services?			
	If "Yes," complete Schedule D, Part IV	9		X
10	Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi-endowments? If "Yes," complete Schedule D, Part V	10	х	
11	If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VIII, IX, or X			
	as applicable.			
а	Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D,			
	Part VI	11a	Х	
b	Did the organization report an amount for investments - other securities in Part X, line 12 that is 5% or more of its total			
	assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII	11b		X
С	Did the organization report an amount for investments - program related in Part X, line 13 that is 5% or more of its total			
	assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII	11c		X
d	Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in			
	Part X, line 16? If "Yes," complete Schedule D, Part IX	11d		X
е	Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X	11e	Х	
f	Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses			
	the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X	11f	Х	
12a	Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete		77	
	Schedule D, Parts XI and XII	12a	Х	
b	Was the organization included in consolidated, independent audited financial statements for the tax year?			17
	If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional	12b	37	X
13	Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13	X	-
14a	Did the organization maintain an office, employees, or agents outside of the United States?	14a		X
b				
	investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000	441		х
1 E	or more? If "Yes," complete Schedule F, Parts I and IV	14b		<u> </u>
15	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV	15		х
16	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to	15		-25
16	or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16		x
17	Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX,	10		
"	column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I	17		х
18	Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines	-''		
	1c and 8a? If "Yes," complete Schedule G, Part II	18		х
19	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes,"	٠.ٽ		
	complete Schedule G, Part III	19		х
	,			

Part IV Checklist of Required Schedules (continued)

			Yes	No
20 a	Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H	20a		X
b	If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?	20 b		
21	Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or			
	domestic government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II	21		Х
22	Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on			
	Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III	22	X	<u> </u>
23	Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization's current			
	and former officers, directors, trustees, key employees, and highest compensated employees? If "Yes," complete			
	Schedule J	23	X	
24a	Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the			
	last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b through 24d and complete			
	Schedule K. If "No", go to line 25a	24a		X
	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?	24b		
С	Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease			
	any tax-exempt bonds?	24c		
	Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?	24d		
25a	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit			
	transaction with a disqualified person during the year? If "Yes," complete Schedule L, Part I	25a		X
b	Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and			
	that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? If "Yes," complete			
	Schedule L, Part I	25b		X
26	Did the organization report any amount on Part X, line 5, 6, or 22 for receivables from or payables to any current or			
	former officers, directors, trustees, key employees, highest compensated employees, or disqualified persons? If "Yes,"			l
	complete Schedule L, Part II	26		X
27	Did the organization provide a grant or other assistance to an officer, director, trustee, key employee, substantial			
	contributor or employee thereof, a grant selection committee member, or to a 35% controlled entity or family member			
	of any of these persons? If "Yes," complete Schedule L, Part III	27		X
28	Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part IV			
	instructions for applicable filing thresholds, conditions, and exceptions):			37
	A current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part IV	28a		X
	A family member of a current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part IV	28b		Х
С	An entity of which a current or former officer, director, trustee, or key employee (or a family member thereof) was an officer,			37
	director, trustee, or direct or indirect owner? If "Yes," complete Schedule L, Part IV	28c		X
29	Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule M	29		X
30	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation			37
	contributions? If "Yes," complete Schedule M	30		X
31	Did the organization liquidate, terminate, or dissolve and cease operations?			_v
	If "Yes," complete Schedule N, Part I	31		X
32	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete			_v
	Schedule N, Part II	32		X
33	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations			_v
•	sections 301.7701-2 and 301.7701-3? If "Yes," complete Schedule R, Part I	33		X
34	Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III, or IV, and			_v
	Part V, line 1	34		X
	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	35a		X
b	If "Yes" to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity			
	within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2	35b		
36	Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization?			_v
	If "Yes," complete Schedule R, Part V, line 2	36		X
37	Did the organization conduct more than 5% of its activities through an entity that is not a related organization			_v
	and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI	37		X
38	Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and 19?		v	
	Note. All Form 990 filers are required to complete Schedule O	38	X	

Form 990 (2017) PALO ALTO UNIVERSITY, INC. Part V Statements Regarding Other IRS Filings and Tax Compliance

	Check if Schedule O contains a response or note to any line in this Part V					Ш			
					Yes	No			
1a	Enter the number reported in Box 3 of Form 1096. Enter -0- if not applicable	1a	48						
b	Enter the number of Forms W-2G included in line 1a. Enter -0- if not applicable		0						
С	Did the organization comply with backup withholding rules for reportable payments to vendors and r	-			37				
	(gambling) winnings to prize winners?		I	1c	X				
2a	Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements,	_	407						
	filed for the calendar year ending with or within the year covered by this return		497		v				
b	If at least one is reported on line 2a, did the organization file all required federal employment tax retu			2b	X				
_	Note. If the sum of lines 1a and 2a is greater than 250, you may be required to <i>e-file</i> (see instructions				Х				
				3a 3b	X				
b If "Yes," has it filed a Form 990-T for this year? If "No," to line 3b, provide an explanation in Schedule O									
4a At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)?									
h	If "Yes," enter the name of the foreign country:	accou	iii) ?	4a		X			
b	See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial A	Accour	nte (FRAR)						
5a	Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?			5a		Х			
b	Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction at any time during the tax year.			5b		X			
	If "Yes," to line 5a or 5b, did the organization file Form 8886-T?			5c					
	Does the organization have annual gross receipts that are normally greater than \$100,000, and did the								
-	any contributions that were not tax deductible as charitable contributions?			6a		Х			
b	If "Yes," did the organization include with every solicitation an express statement that such contribution								
	were not tax deductible?		-	6b					
7	Organizations that may receive deductible contributions under section 170(c).								
а	Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and se	rvices	provided to the payor?	7a		Х			
b	If "Yes," did the organization notify the donor of the value of the goods or services provided?			7b					
С	Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it w	as rec	uired						
	to file Form 8282?			7с		X			
d	If "Yes," indicate the number of Forms 8282 filed during the year	7d							
е	Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit of		ct?	7e		X			
f	Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit cont	ract?		7f		<u> </u>			
g	If the organization received a contribution of qualified intellectual property, did the organization file F			7g					
h	If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization			7h					
8	Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained	d by th	е						
	sponsoring organization have excess business holdings at any time during the year?			8					
9	Sponsoring organizations maintaining donor advised funds.			_					
				9a					
	Did the sponsoring organization make a distribution to a donor, donor advisor, or related person?			9b					
10	Section 501(c)(7) organizations. Enter:	۔مد ا	I						
	Initiation fees and capital contributions included on Part VIII, line 12	10a							
р 11	Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities	10b	I						
		11a							
	Gross income from members or shareholders Gross income from other sources (Do not net amounts due or paid to other sources against	''a							
~	amounts due or received from them.)	11b							
12a	Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form		?	12a					
	If "Yes," enter the amount of tax-exempt interest received or accrued during the year	12b							
13	Section 501(c)(29) qualified nonprofit health insurance issuers.		•						
	Is the organization licensed to issue qualified health plans in more than one state?			13a					
	Note. See the instructions for additional information the organization must report on Schedule O.								
b	Enter the amount of reserves the organization is required to maintain by the states in which the								
	organization is licensed to issue qualified health plans	13b							
С	Enter the amount of reserves on hand	13c							
14a	Did the organization receive any payments for indoor tanning services during the tax year?			14a		X			
b	If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedul	le O		14b					
				Form	990	(2017)			

Part VI Governance, Management, and Disclosure For each "Yes" response to lines 2 through 7b below, and for a "No" response to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions.

	Check if Schedule O contains a response or note to any line in this Part VI				X						
Sec	tion A. Governing Body and Management										
				Yes	No						
1a	Enter the number of voting members of the governing body at the end of the tax year	23									
	If there are material differences in voting rights among members of the governing body, or if the governing										
	body delegated broad authority to an executive committee or similar committee, explain in Schedule O.										
b	Enter the number of voting members included in line 1a, above, who are independent 1b	23									
2	2 Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other										
	officer, director, trustee, or key employee?										
3	3 Did the organization delegate control over management duties customarily performed by or under the direct supervision										
	of officers, directors, or trustees, or key employees to a management company or other person?										
4	4 Did the organization make any significant changes to its governing documents since the prior Form 990 was filed?										
5											
6	Did the organization have members or stockholders?		6		Х						
7a											
	more members of the governing body?		7a		Х						
b											
	persons other than the governing body?		7b		Х						
8	Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the followin	g:									
а	The governing body?		8a	Х							
b	Each committee with authority to act on behalf of the governing body?		8b	X							
9	Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the										
	organization's mailing address? If "Yes," provide the names and addresses in Schedule O		9		X						
Sec	etion B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)										
				Yes	No						
10a	Did the organization have local chapters, branches, or affiliates?		10a		X						
b	If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliate	es,									
	and branches to ensure their operations are consistent with the organization's exempt purposes?		10b								
11a	Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing to	:he form?	11a	Х							
b	Describe in Schedule O the process, if any, used by the organization to review this Form 990.										
12a	Did the organization have a written conflict of interest policy? If "No," go to line 13		12a	Х							
b	Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?		12b	Х							
С	Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe										
	in Schedule O how this was done		12c	Х							
13	Did the organization have a written whistleblower policy?		13	X							
14	Did the organization have a written document retention and destruction policy?		14	X							
15	Did the process for determining compensation of the following persons include a review and approval by independ	ent									
	persons, comparability data, and contemporaneous substantiation of the deliberation and decision?										
а	The organization's CEO, Executive Director, or top management official		15a	Х							
b	Other officers or key employees of the organization		15b	X							
	If "Yes" to line 15a or 15b, describe the process in Schedule O (see instructions).										
16a	Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a										
	taxable entity during the year?		16a		Х						
b	If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participat	ion									
	in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's										
	exempt status with respect to such arrangements?		16b								
Sec	tion C. Disclosure										
17	List the states with which a copy of this Form 990 is required to be filed ► NONE										
18	Section 6104 requires an organization to make its Forms 1023 (or 1024 if applicable), 990, and 990-T (Section 501(c)(3)s only) a	vailab	le							
	for public inspection. Indicate how you made these available. Check all that apply.										
	X Own website Another's website X Upon request Other (explain in Schedule O)									
19	Describe in Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest	t policy, and	finan	cial							
	statements available to the public during the tax year.										
20	State the name, address, and telephone number of the person who possesses the organization's books and record	ls:▶									
	JUNE KLEIN - 800-818-6136										
	1791 ARASTRADERO ROAD, PALO ALTO, CA 94304										

Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Check if Schedule O contains a response or note to any line in this Part VII

Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

- 1a Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.
- List all of the organization's **current** officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.
 - List all of the organization's current key employees, if any. See instructions for definition of "key employee."
- List the organization's five current highest compensated employees (other than an officer, director, trustee, or key employee) who received reportable compensation (Box 5 of Form W-2 and/or Box 7 of Form 1099-MISC) of more than \$100,000 from the organization and any related organizations.
- List all of the organization's **former** officers, key employees, and highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.
- List all of the organization's **former directors or trustees** that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations.

Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

List persons in the following order: individual trustees or directors; institutional trustees; officers; key employees; highest compensated employees; and former such persons.

(A) Name and Title	(B) Average hours per week	box	not c , unle	(C) Position check more than one cas person is both an and a director/trustee)				(D) Reportable compensation from	(E) Reportable compensation from related	(F) Estimated amount of other
	(list any hours for related organizations below line)	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	the organization (W-2/1099-MISC)	organizations (W-2/1099-MISC)	compensation from the organization and related organizations
(1) NICHOLAS COCHRAN	3.00	ļ.,							0	0
TRUSTEE	2 00	Х						0.	0.	0.
(2) MARTIN DODD	3.00	,,							0	0
TRUSTEE	2 00	Х						0.	0.	0.
(3) RITA DESALES FRENCH	3.00	,,							0	0
TRUSTEE (THRU 5/2/18)	2 00	Х						0.	0.	0.
(4) JEFF GEE	3.00	,,							0	0
TRUSTEE	2 00	Х						0.	0.	0.
(5) BERTON KEITH	3.00	٠,,							0	0
TRUSTEE	2 00	Х						0.	0.	0.
(6) MICHAEL KERNER	3.00	٠,,							0	0
TRUSTEE	3 00	Х						0.	0.	0.
(7) IRIS KOROL	3.00	٠,,							0	0
TRUSTEE	2 00	Х						0.	0.	0.
(8) DANIEL KOSTENBAUDER	3.00	. ,							0.	0
TRUSTEE	3.00	Х						0.	0.	0.
(9) MATT LEVINE	3.00	X						0.	0.	0.
TRUSTEE	3.00	^						0.	0.	0.
(10) DANIELE LEVY	3.00	X						0.	0.	0.
TRUSTEE	3.00	Δ						0.	0.	0.
(11) MARILYN MANNING LONERGAN TRUSTEE	3.00	X						0.	0.	0.
(12) RICHARD LONERGAN	3.00	^						0.	0.	<u></u>
TRUSTEE	3.00	X						0.	0.	0.
(13) THOMAS MACCALLA	3.00							0.	0.	
TRUSTEE	3.00	x						0.	0.	0.
(14) DEREK MINNO	3.00							0.	•	
TRUSTEE	3.00	x						0.	0.	0.
(15) NAZ MOTAYAR	3.00									
TRUSTEE	3,00	x						0.	0.	0.
(16) FRED NERVO	3.00						\vdash			
TRUSTEE (THRU 11/15/17)		x						0.	0.	0.
(17) ISRAEL NIV	3.00	<u> </u>								
TRUSTEE		х						0.	0.	0.
700007 11 00 17	<u> </u>		_			_	_			Form 991 (2017)

732007 11-28-17

Port VIII	010 011110			- ,		10	_		<u> </u>	OJZ Tage O	
Part VII Section A. Officers, Directors,	Trustees, Key Em	ploy	ees	, an	d Hi	ghe	st C	ompensated Employe	es (continued)		
(A)	(B)				C)			(D)	(E)	(F)	
Name and title	Average hours per week	Position (do not check more than one box, unless person is both an officer and a director/trustee)					h an	Reportable compensation from	Reportable compensation from related	Estimated amount of other	
	(list any hours for related organizations below line)	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	the organization (W-2/1099-MISC)	organizations (W-2/1099-MISC)	compensation from the organization and related organizations	
(18) JENNIFER ORTHWEIN	3.00	ا ا									
TRUSTEE		Х						0.	0.	0.	
(19) RABBI STEPHEN PEARCE TRUSTEE (THRU 11/15/17)	3.00	x						0.	0.	0.	
(20) KATHRYN PRYOR	3.00										
TRUSTEE		Х						0.	0.	0.	
(21) GORDON RAUSSER	3.00										
TRUSTEE (THRU 1/15/18)		Х						0.	0.	0.	
(22) LAURA ROBERTS TRUSTEE (THRU 6/22/18)	3.00	х						0.	0.	0.	
(23) FRED SEDDIOUI	3.00							-	•		
TRUSTEE		х						0.	0.	0.	
(24) GARY SHAPIRO	3.00										
TRUSTEE		Х						0.	0.	0.	
(25) ELLEN SHUCK	3.00										
TRUSTEE		Х						0.	0.	0.	
(26) RALPH WOLFF	3.00							_	_	_	
TRUSTEE (THRU 7/9/18)		Х						0.	0.	0.	
1b Sub-total								0.	0.	0.	
c Total from continuation sheets to Pa								2,494,020.	0.	143,356.	
d Total (add lines 1b and 1c)								2,494,020.	L	143,356.	
2 Total number of individuals (including becompensation from the organization		iose	liste	ed al	bove	e) wh	no re	eceived more than \$100	0,000 of reportable	54	
										Yes No	

Yes No

X

line 1a? If "Yes," complete Schedule J for such individual
 For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule J for such individual
 Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services

3 Did the organization list any former officer, director, or trustee, key employee, or highest compensated employee on

rendered to the organization? If "Yes," complete Schedule J for such person . Section B. Independent Contractors

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

(A)	(B)	(C)
Name and business address	Description of services	Compensation
STANFORD UNIVERSITY		
401 QUARRY ROAD RM 3208, STANFORD, CA 94035	CONSORTIUM	3,011,206.
A & A COMPUTERS, INC., 1600 WYATT DRIVE,		
SUITE #3, SAN JOSE, CA 95054	IT SOLUTIONS CO.	255,153.
STATEWIDE CALIFORNIA ELECTRONIC LIBRARY CON		
· · · · · · · · · · · · · · · · · · ·	E-LIBRARY CONSORTIUM	208,503.
CARNEGIE DARTLET LLC, 210 LITTLETON ROAD,		
	MARKETING SERVICES	179,529.
DE ANZA COLLEGE, 21250 STEVENS CREEK BLVD,		
CUPERTINO, CA 95014	CONSORTIUM	163,776.
2 Total number of independent contractors (including but not limited to those liste	d above) who received more than	
\$100,000 of compensation from the organization > 8		

SEE PART VII, SECTION A CONTINUATION SHEETS

Form 990 PALO ALTO	O UNIVE	RS:	[T]	Ζ,	II	1C	•		94-234	0692	
Part VII Section A. Officers, Directors, Tru	stees, Key Er	nplo	yee	s, a	nd F	ligh	est	Compensated Employ	ees (continued)		
(A)	(A) (B) (C) (D) (E) (F)										
Name and title	Average			Pos	ition	1		Reportable	Reportable	Estimated	
	hours	(cl	(check all that app			арр	ly)	compensation	compensation	amount of	
	per							from	from related	other	
	week	_				oyee		the	organizations	compensation	
	(list any	irecto				empl		organization	(W-2/1099-MISC)	from the	
	hours for related	ord	ee			sated		(W-2/1099-MISC)		organization and related	
	organizations	Individual trustee or director	nstitutional trustee		ee	npen				organizations	
	below	dualt	rtiona		nplo)	st cor	<u></u>			organizations	
	line)	Indivi	Institu	Officer	Key employee	Highest compensated employee	Former				
(27) JORGE WONG	3.00										
TRUSTEE		Х						0.	0.	0.	
(28) TOM YEH	3.00										
TRUSTEE		Х						0.	0.	0.	
(29) CALLIE WATSON	3.00										
TRUSTEE		Х						0.	0.	0.	
(30) MAUREEN O'CONNOR	40.00										
PRESIDENT				Х				429,733.	0.	23,745.	
(31) WILLIAM FROMING	40.00									-	
PROVOST				Х				399,095.	0.	20,010.	
(32) JUNE KLEIN	40.00										
VP BUSINESS AFFAIRS/ CFO				Х				250,215.	0.	22,930.	
(33) LULI EMMONS	40.00										
VP OFFICE OF PROF ADVISING & DEVEL				Х				188,387.	0.	9,139.	
(34) ROWENA GOMEZ	40.00										
ASSOCIATE PROFESSOR						Х		269,630.	0.	13,539.	
(35) RICARDO MUNOZ	40.00										
PROFESSOR						Х		258,519.	0.	13,728.	
(36) JAMES BRECKENRIDGE	40.00										
DEAN OF ACADEMIC ADMINISTRATION & OP						Х		250,275.	0.	13,300.	
(37) JOYCE MOORE	40.00										
ASSOCIATE PROFESSOR						Х		229,885.	0.	15,994.	
(38) PAUL MARCILLE	40.00										
DIRECTOR, UNDERGRADUATE PROGRAM						Х		218,281.	0.	10,971.	
		ļ									
		_				_					
		ł									
		_		\vdash		_	<u> </u>				
		ł									
					<u> </u>						
Tatalda Bartilli Ocation A. I								2,494,020.		143,356.	
Total to Part VII, Section A, line 1c								4,494,040.		T-3,330.	

Part VIII Statement of Revenue Check if Schedule O contains a response or note to any line in this Part VIII (B) (C) (**D)** Revenue excluded Related or Unrelated Total revenue from tax under exempt function business revenue revenue Contributions, Gifts, Grants and Other Similar Amounts 1 a Federated campaigns **b** Membership dues 1b c Fundraising events d Related organizations 1d 557,358. e Government grants (contributions) f All other contributions, gifts, grants, and similar amounts not included above 473,085 11,943 g Noncash contributions included in lines 1a-1f: \$ 1,030,443, h Total. Add lines 1a-1f Business Code 2 a TUITION Program Service Revenue 611600 27,226,139 27,226,139 b COURSE FEES 611600 3,965,399 3,965,399 c CLINIC INCOME 611710 412,686 412,686 OTHER PROGRAM INCOME 18,971 611710 18,971. APPLICATION AND REGISTRATION FEES 611710 8,100. 8,100 All other program service revenue g Total. Add lines 2a-2f 31,631,295 Investment income (including dividends, interest, and 92,921 92,921. other similar amounts) Income from investment of tax-exempt bond proceeds 5 Royalties (i) Real (ii) Personal 442. 6 a Gross rents 0. **b** Less: rental expenses c Rental income or (loss) d Net rental income or (loss) . 442 442. 7 a Gross amount from sales of (i) Securities (ii) Other 579,648. assets other than inventory b Less: cost or other basis 530,555 and sales expenses 49,093. c Gain or (loss) 49,093 49,093. d Net gain or (loss) 8 a Gross income from fundraising events (not Revenue including \$ contributions reported on line 1c). See Part IV, line 18 a Other **b** Less: direct expenses c Net income or (loss) from fundraising events 9 a Gross income from gaming activities. See Part IV, line 19 a **b** Less: direct expenses c Net income or (loss) from gaming activities ... 10 a Gross sales of inventory, less returns and allowances **b** Less: cost of goods sold **c** Net income or (loss) from sales of inventory Miscellaneous Revenue **Business Code** 11 a b d All other revenue e Total. Add lines 11a-11d 142,456. Total revenue. See instructions. 32,804,194. 31,631,295

Part IX | Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A). Check if Schedule O contains a response or note to any line in this Part IX (D) (C) Do not include amounts reported on lines 6b. Program service expenses Total expenses Management and general expenses Fundraising 7b, 8b, 9b, and 10b of Part VIII. expenses Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21 Grants and other assistance to domestic individuals. See Part IV, line 22 991,322. 991,322. Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16 Benefits paid to or for members Compensation of current officers, directors, 1,270,261. 587,370. 682,891. trustees, and key employees Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B) 15,524,746. 13,107,101. 2,284,378. 133,267. Other salaries and wages 7 Pension plan accruals and contributions (include 128,370. 685,621 550,771. 6,480. section 401(k) and 403(b) employer contributions) 14,717. 658,239. 483,359. 160,163. Other employee benefits 9 1,118,430. 182,528. Payroll taxes 925,657. 10,245. 10 Fees for services (non-employees): 947,710. 410,748. 535,920. 1,042. a Management 55,474. 58,566. 3,092. Legal 126,000. 126,000. Accounting Lobbying Professional fundraising services. See Part IV, line 17 Investment management fees Other, (If line 11g amount exceeds 10% of line 25, 2,500. 120,557. 123,057. column (A) amount, list line 11g expenses on Sch O.) 153,067. 260,888. 102,061. 5,760. Advertising and promotion 12 47,186. 392,521 344,912. 423. 13 Office expenses 852,458. 734,525. 105,014. 12,919. 14 Information technology 15 Royalties 275,258. 27,696. 1,539,837. 1,236,883. 16 Occupancy 85,108. 320,837. 234,482. 1,247. 17 Travel Payments of travel or entertainment expenses for any federal, state, or local public officials 74,769. 108,426. 33,445. 212. Conferences, conventions, and meetings 19 Interest 20 Payments to affiliates 21 95,784. 13,897. 555,152. 445,471. Depreciation, depletion, and amortization 22 180,468. 180,468. 23 Other expenses. Itemize expenses not covered 24 above. (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.) CONSORTIUM PAYMENTS 3,330,922. 3,330,922. MEALS AND ENTERTAINMENT 321,447. 201,321. 117,390. 2,736. 175,384. 175,384. BAD DEBT EXPENSE 58,922. 75,325. 6,446. 140,693. PROFESSIONAL DUES & LIC 9,294. 609,684. 255,344. 874,322. e All other expenses Total functional expenses. Add lines 1 through 24e 30,557,307. 24,154,549. 6,156,377. 246,381. 25 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here if following SOP 98-2 (ASC 958-720)

Part X Balance Sheet

Ра	πх	Balance Sneet			
		Check if Schedule O contains a response or note to any line in this Part X			
			(A)		(B)
			Beginning of year		End of year
	1	Cash - non-interest-bearing	6,609,825.	1	3,831,002.
	2	Savings and temporary cash investments	464,910.	2	5,394,989.
	3	Pledges and grants receivable, net	1,415,850.	3	1,103,746.
	4	Accounts receivable, net	8,917,489.	4	8,613,193.
	5	Loans and other receivables from current and former officers, directors,			
		trustees, key employees, and highest compensated employees. Complete			
		Part II of Schedule L		5	
	6	Loans and other receivables from other disqualified persons (as defined under			
		section 4958(f)(1)), persons described in section 4958(c)(3)(B), and contributing			
		employers and sponsoring organizations of section 501(c)(9) voluntary			
ş		employees' beneficiary organizations (see instr). Complete Part II of Sch L		6	
Assets	7	Notes and loans receivable, net		7	
⋖	8	Inventories for sale or use		8	
	9	Prepaid expenses and deferred charges	491,393.	9	640,537.
	10a	Land, buildings, and equipment: cost or other			
		basis. Complete Part VI of Schedule D 10a 13,315,352.			
	b	Less: accumulated depreciation 10b 5,195,947.	7,780,923.	10c	8,119,405.
	11	Investments - publicly traded securities	2,191,316.	11	2,405,939.
	12	Investments - other securities. See Part IV, line 11	264,525.	12	264,525.
	13	Investments - program-related. See Part IV, line 11		13	
	14	Intangible assets	100 106	14	0.40 = 0.4
	15	Other assets. See Part IV, line 11	100,436.	15	249,734.
	16	Total assets. Add lines 1 through 15 (must equal line 34)	28,236,667.	16	30,623,070.
	17	Accounts payable and accrued expenses	2,160,964.	17	2,136,557.
	18	Grants payable	0.	18	31,816.
	19	Deferred revenue	9,540,829.	19	9,678,886.
	20	Tax-exempt bond liabilities		20	
	21	Escrow or custodial account liability. Complete Part IV of Schedule D		21	
ies	22	Loans and other payables to current and former officers, directors, trustees,			
i i		key employees, highest compensated employees, and disqualified persons.			
Liabilities		Complete Part II of Schedule L		22	
	23	Secured mortgages and notes payable to unrelated third parties		23	
	24	Unsecured notes and loans payable to unrelated third parties		24	
	25	Other liabilities (including federal income tax, payables to related third			
		parties, and other liabilities not included on lines 17-24). Complete Part X of Schedule D	42,500.	25	220,604.
	26	T 1 10 1 1000 A 1 10 A 7 11 A 7 11	11,744,293.	26	12,067,863.
	20	Organizations that follow SFAS 117 (ASC 958), check here	11//11/2550	20	12/00//0000
S		complete lines 27 through 29, and lines 33 and 34.			
e)C	27	Unrestricted net assets	14,885,488.	27	16,874,345.
Fund Balances	28	Temporarily restricted net assets	921,604.	28	988,626.
Ä	29	Permanently restricted net assets	685,282.	29	692,236.
ڃ		Organizations that do not follow SFAS 117 (ASC 958), check here ▶	,		,
P.		and complete lines 30 through 34.			
ts	30	Capital stock or trust principal, or current funds		30	
SSE	31	Paid-in or capital surplus, or land, building, or equipment fund		31	
Net Assets or	32	Retained earnings, endowment, accumulated income, or other funds		32	
ž	33	Total net assets or fund balances	16,492,374.	33	18,555,207.
	34	Total liabilities and net assets/fund balances	28,236,667.	34	30,623,070.

Form **990** (2017)

Pa	rt XI Reconciliation of Net Assets							
	Check if Schedule O contains a response or note to any line in this Part XI					X		
1	Total revenue (must equal Part VIII, column (A), line 12)	1		,80				
2	Total expenses (must equal Part IX, column (A), line 25)	2		, 55				
3	Revenue less expenses. Subtract line 2 from line 1	3	2	, 24	6,8	87.		
4	Net assets or fund balances at beginning of year (must equal Part X, line 33, column (A)) 4 1							
5	Net unrealized gains (losses) on investments	5		7	9,2	75.		
6	Donated services and use of facilities	6						
7	Investment expenses	7						
8	Prior period adjustments	8						
9	Other changes in net assets or fund balances (explain in Schedule O)	9		-26	3,3	29.		
10	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 33,							
	column (B))	10	18	, 55	5,2	07.		
Pa	rt XII Financial Statements and Reporting							
	Check if Schedule O contains a response or note to any line in this Part XII							
					Yes	No		
1	Accounting method used to prepare the Form 990: Cash X Accrual Other							
	If the organization changed its method of accounting from a prior year or checked "Other," explain in Schedule	O.						
2a	Were the organization's financial statements compiled or reviewed by an independent accountant?			2a		Х		
	If "Yes," check a box below to indicate whether the financial statements for the year were compiled or reviewed	d on a						
	separate basis, consolidated basis, or both:							
	Separate basis Consolidated basis Both consolidated and separate basis							
b	Were the organization's financial statements audited by an independent accountant?			2b	Х			
	If "Yes," check a box below to indicate whether the financial statements for the year were audited on a separat	e basis	,					
	consolidated basis, or both:							
	X Separate basis Consolidated basis Both consolidated and separate basis							
С	If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the	e audit,						
	review, or compilation of its financial statements and selection of an independent accountant?			2c	Х			
	If the organization changed either its oversight process or selection process during the tax year, explain in Sch	edule O).					
За	As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Si	ngle Au	dit					
	Act and OMB Circular A-133?			3a	Х			
b	If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required	ired aud	dit					
	exploits, exploin why in Cohedula O and describe any stone taken to undergo such gudita			26	X	I		

PALO ALTO UNIVERSITY, INC.

SCHEDULE A

(Form 990 or 990-EZ)

Department of the Treasury Internal Revenue Service

Public Charity Status and Public Support Complete if the organization is a section 501(c)(3) organization or a section

4947(a)(1) nonexempt charitable trust.

► Attach to Form 990 or Form 990-EZ.

▶ Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

Open to Public Inspection

Name of the organization PALO ALTO UNIVERSITY, INC. **Employer identification number** 94-2340692

Pa	rt I	Reason for Public (Charity Status (All organizations must co	omplete th	is part.) Se	ee instructions.	
The	organ	ization is not a private found	lation because it is: (For lines 1 through 12, o	heck only	one box.)		
1		A church, convention of ch						
2	X	A school described in sect i						
3		A hospital or a cooperative					ii).	
4	一	A medical research organiz						the hospital's name
		city, and state:	орогалов III оо	ngan onon man a moopha		000		,
5		An organization operated for	or the benefit of a co	llege or university owner	d or operat	ted by a d	overnmental unit describ	ned in
J		section 170(b)(1)(A)(iv). (C		ilege of difficerally owner	а ог орста	ica by a g	overnmental and desent)CG 1
6		A federal, state, or local gov		aantal unit daaarihad in	coetion 17	70/6\/4\/A\	(v)	
6	H	, ,	ū				• •	nublic described in
′		An organization that norma	-	riliai part of its support i	rom a gov	emmentai	unit or from the general	public described in
_		section 170(b)(1)(A)(vi). (C	•	(4)(A)(-1) (Ol-t- D				
8	H	A community trust describe						
9		An agricultural research org	-			-		-
		or university or a non-land-g	grant college of agric	ulture (see instructions).	Enter the	name, city	, and state of the colleg	e or
		university:						
10	ш	An organization that norma						
		activities related to its exen	•	•				•
		income and unrelated busin		(less section 511 tax) from	om busine	sses acqu	ired by the organization	after June 30, 1975.
		See section 509(a)(2). (Cor						
11	H	An organization organized a	=	•	•			
12	ш	An organization organized a	•	•	•		•	• •
		more publicly supported or						Check the box in
		lines 12a through 12d that	* *			-	· · · · · ·	
а			· · · · · · · · · · · · · · · · · · ·			•		
		the supported organization			a majority	of the dire	ctors or trustees of the s	supporting
		organization. You must o						
b			•					•
		control or management o			ame perso	ons that co	ontrol or manage the sup	pported
		organization(s). You mus						
С							•	ed with,
		its supported organization		•				
d							•	` '
		that is not functionally int	egrated. The organiz	zation generally must sat	tisfy a dist	ribution re	quirement and an attent	iveness
		requirement (see instruct	ions). You must con	nplete Part IV, Sections	s A and D,	and Part	V.	
е		☐ Check this box if the orga	anization received a	written determination fro	m the IRS	that it is a	Type I, Type II, Type III	
		functionally integrated, or	* *	nally integrated support	ing organiz	zation.		
f		er the number of supported o	•					
g		vide the following information		ed organization(s). (iii) Type of organization	(iv) Is the orga	nization listed	(a) Amount of monotons	(vi) Amount of other
	(i) Name of supported organization	(ii) EIN	(described on lines 1-10	in your governi	ng document?	(v) Amount of monetary support (see instructions)	(vi) Amount of other support (see instructions)
		organization		above (see instructions))	Yes	No	Support (See metractions)	Support (See motradions)
Tot:	.,							
OT?								

Schedule A (Form 990 or 990-EZ) 2017 PALO ALTO UNIVERSITY, INC. 94-23406 Part II Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi)

(Complete only if you checked the box on line 5, 7, or 8 of Part I or if the organization failed to qualify under Part III. If the organization fails to qualify under the tests listed below, please complete Part III.)

Sed	tion A. Public Support						
Cale	ndar year (or fiscal year beginning in)	(a) 2013	(b) 2014	(c) 2015	(d) 2016	(e) 2017	(f) Total
1	Gifts, grants, contributions, and						
	membership fees received. (Do not						
	include any "unusual grants.")						
2	Tax revenues levied for the organ-						
	ization's benefit and either paid to						
	or expended on its behalf						
3	The value of services or facilities						
	furnished by a governmental unit to						
	the organization without charge						
4	Total. Add lines 1 through 3						
	The portion of total contributions						
_	by each person (other than a						
	governmental unit or publicly						
	supported organization) included						
	on line 1 that exceeds 2% of the						
	amount shown on line 11,						
	column (f)						
6	Public support. Subtract line 5 from line 4.						
	tion B. Total Support					•	
Cale	ndar year (or fiscal year beginning in)	(a) 2013	(b) 2014	(c) 2015	(d) 2016	(e) 2017	(f) Total
7	Amounts from line 4	, ,	, ,		, ,	, ,	``
	Gross income from interest,						
	dividends, payments received on						
	securities loans, rents, royalties,						
	and income from similar sources						
9	Net income from unrelated business						
	activities, whether or not the						
	business is regularly carried on						
10	Other income. Do not include gain						
	or loss from the sale of capital						
	assets (Explain in Part VI.)						
11	Total support. Add lines 7 through 10						
	Gross receipts from related activities,	etc. (see instructi	ions)		•	12	•
	First five years. If the Form 990 is for	•	,			on 501(c)(3)	
	organization, check this box and stop						
Sec	tion C. Computation of Publ	ic Support Pe	rcentage				·
14	Public support percentage for 2017 (I	ine 6, column (f) d	livided by line 11,	column (f))		14	%
15	Public support percentage from 2016	Schedule A, Part	II, line 14			15	%
	33 1/3% support test - 2017. If the o					more, check this b	ox and
	stop here. The organization qualifies	as a publicly supp	oorted organizatio	n			
b	33 1/3% support test - 2016. If the o						
	and stop here. The organization qual	ifies as a publicly	supported organiz	zation			
17a	10% -facts-and-circumstances tes						or more,
	and if the organization meets the "fac						
	meets the "facts-and-circumstances"	test. The organiza	ation qualifies as a	a publicly supporte	ed organization		
b	10% -facts-and-circumstances tes						
	more, and if the organization meets th	_					
	organization meets the "facts-and-circ						
18	Private foundation. If the organizatio		-				
						edule A (Form 990	

Part III | Support Schedule for Organizations Described in Section 509(a)(2)

(Complete only if you checked the box on line 10 of Part I or if the organization failed to qualify under Part II. If the organization fails to qualify under the tests listed below, please complete Part II.)

Se	ction A. Public Support						
Cale	endar year (or fiscal year beginning in)	(a) 2013	(b) 2014	(c) 2015	(d) 2016	(e) 2017	(f) Total
1	Gifts, grants, contributions, and						
	membership fees received. (Do not						
	include any "unusual grants.")						
2	Gross receipts from admissions,						
	merchandise sold or services per-						
	formed, or facilities furnished in						
	any activity that is related to the organization's tax-exempt purpose						
3	Gross receipts from activities that						
_	are not an unrelated trade or bus-						
	iness under section 513						
4							
•	ization's benefit and either paid to						
	or expended on its behalf						
5	The value of services or facilities						
J	furnished by a governmental unit to						
	the organization without charge						
6	Total. Add lines 1 through 5						
	-						
/ 6	Amounts included on lines 1, 2, and						
,	3 received from disqualified persons Amounts included on lines 2 and 3 received						_
•	from other than disqualified persons that						
	exceed the greater of \$5,000 or 1% of the						
	amount on line 13 for the year						
	Add lines 7a and 7b						_
	Public support. (Subtract line 7c from line 6.)						
	ction B. Total Support						<u> </u>
	endar year (or fiscal year beginning in)	(a) 2013	(b) 2014	(c) 2015	(d) 2016	(e) 2017	(f) Total
	Amounts from line 6						
108	Gross income from interest, dividends, payments received on						
	securities loans, rents, royalties,						
	and income from similar sources						
ŀ	Unrelated business taxable income						
	(less section 511 taxes) from businesses						
	acquired after June 30, 1975						
	Add lines 10a and 10b						
11	Net income from unrelated business						
	activities not included in line 10b, whether or not the business is						
	regularly carried on						
12	Other income. Do not include gain						
	or loss from the sale of capital assets (Explain in Part VI.)						
13	Total support. (Add lines 9, 10c, 11, and 12.)						
14	First five years. If the Form 990 is for	the organization's	s first, second, thir	d, fourth, or fifth t	ax year as a section	on 501(c)(3) organi	zation,
	check this box and stop here						>
Se	ction C. Computation of Publ	ic Support Pe	rcentage				
15	Public support percentage for 2017 (I	ine 8, column (f) d	ivided by line 13, o	column (f))		15	%
16	Public support percentage from 2016	Schedule A, Part	III, line 15			16	%
Se	ction D. Computation of Inves	stment Incom	e Percentage				
17	Investment income percentage for 20	17 (line 10c, colur	nn (f) divided by lir	ne 13, column (f))		17	%
	Investment income percentage from 2					18	%
	a 33 1/3% support tests - 2017. If the						
•	more than 33 1/3%, check this box a						
ŀ	33 1/3% support tests - 2016. If the						
•	line 18 is not more than 33 1/3%, che						
20							

Part IV | Supporting Organizations

(Complete only if you checked a box in line 12 on Part I. If you checked 12a of Part I, complete Sections A and B. If you checked 12b of Part I, complete Sections A and C. If you checked 12c of Part I, complete Sections A, D, and E. If you checked 12d of Part I, complete Sections A and D, and complete Part V.)

Section A. All Supporting Organizations

- 1 Are all of the organization's supported organizations listed by name in the organization's governing documents? If "No," describe in Part VI how the supported organizations are designated. If designated by class or purpose, describe the designation. If historic and continuing relationship, explain.
- 2 Did the organization have any supported organization that does not have an IRS determination of status under section 509(a)(1) or (2)? If "Yes," explain in **Part VI** how the organization determined that the supported organization was described in section 509(a)(1) or (2).
- 3a Did the organization have a supported organization described in section 501(c)(4), (5), or (6)? If "Yes," answer (b) and (c) below.
- **b** Did the organization confirm that each supported organization qualified under section 501(c)(4), (5), or (6) and satisfied the public support tests under section 509(a)(2)? If "Yes," describe in **Part VI** when and how the organization made the determination.
- c Did the organization ensure that all support to such organizations was used exclusively for section 170(c)(2)(B) purposes? If "Yes," explain in Part VI what controls the organization put in place to ensure such use.
- **4a** Was any supported organization not organized in the United States ("foreign supported organization")? *If* "Yes," and if you checked 12a or 12b in Part I, answer (b) and (c) below.
- **b** Did the organization have ultimate control and discretion in deciding whether to make grants to the foreign supported organization? If "Yes," describe in **Part VI** how the organization had such control and discretion despite being controlled or supervised by or in connection with its supported organizations.
- c Did the organization support any foreign supported organization that does not have an IRS determination under sections 501(c)(3) and 509(a)(1) or (2)? If "Yes," explain in Part VI what controls the organization used to ensure that all support to the foreign supported organization was used exclusively for section 170(c)(2)(B) purposes.
- 5a Did the organization add, substitute, or remove any supported organizations during the tax year? If "Yes," answer (b) and (c) below (if applicable). Also, provide detail in Part VI, including (i) the names and EIN numbers of the supported organizations added, substituted, or removed; (ii) the reasons for each such action; (iii) the authority under the organization's organizing document authorizing such action; and (iv) how the action was accomplished (such as by amendment to the organizing document).
- **b** Type I or Type II only. Was any added or substituted supported organization part of a class already designated in the organization's organizing document?
- c Substitutions only. Was the substitution the result of an event beyond the organization's control?
- 6 Did the organization provide support (whether in the form of grants or the provision of services or facilities) to anyone other than (i) its supported organizations, (ii) individuals that are part of the charitable class benefited by one or more of its supported organizations, or (iii) other supporting organizations that also support or benefit one or more of the filing organization's supported organizations? If "Yes," provide detail in Part VI.
- 7 Did the organization provide a grant, loan, compensation, or other similar payment to a substantial contributor (defined in section 4958(c)(3)(C)), a family member of a substantial contributor, or a 35% controlled entity with regard to a substantial contributor? If "Yes," complete Part I of Schedule L (Form 990 or 990-EZ).
- 8 Did the organization make a loan to a disqualified person (as defined in section 4958) not described in line 7? If "Yes," complete Part I of Schedule L (Form 990 or 990-EZ).
- 9a Was the organization controlled directly or indirectly at any time during the tax year by one or more disqualified persons as defined in section 4946 (other than foundation managers and organizations described in section 509(a)(1) or (2))? If "Yes," provide detail in Part VI.
- **b** Did one or more disqualified persons (as defined in line 9a) hold a controlling interest in any entity in which the supporting organization had an interest? If "Yes," provide detail in Part VI.
- c Did a disqualified person (as defined in line 9a) have an ownership interest in, or derive any personal benefit from, assets in which the supporting organization also had an interest? If "Yes," provide detail in Part VI.
- 10a Was the organization subject to the excess business holdings rules of section 4943 because of section 4943(f) (regarding certain Type II supporting organizations, and all Type III non-functionally integrated supporting organizations)? If "Yes," answer 10b below.
 - **b** Did the organization have any excess business holdings in the tax year? (Use Schedule C, Form 4720, to determine whether the organization had excess business holdings.)

1		Yes	No
	1		
	•		
	2		
	3a		
	3b		
	_		
	3с		
	40		
	4a		
	4b		
	4c		
	_		
	5a		
	5b		
	5c		
	6		
	7		
	8		
	9a		
	9b		
	9с		
	10a		
	404		
m O	10b 90 or 99	10-E7	2017
	しい ひに ざき	/U LL	

Par	rt IV Supporting Organizations _(continued)			
	·		Yes	No
11	Has the organization accepted a gift or contribution from any of the following persons?			
а	A person who directly or indirectly controls, either alone or together with persons described in (b) and (c)			
	below, the governing body of a supported organization?	11a		
b	A family member of a person described in (a) above?	11b		
	A 35% controlled entity of a person described in (a) or (b) above? If "Yes" to a, b, or c, provide detail in Part VI.	11c		<u></u>
Sect	tion B. Type I Supporting Organizations			
			Yes	No
	Did the directors, trustees, or membership of one or more supported organizations have the power to			
	regularly appoint or elect at least a majority of the organization's directors or trustees at all times during the			
	tax year? If "No," describe in Part VI how the supported organization(s) effectively operated, supervised, or			
	controlled the organization's activities. If the organization had more than one supported organization,			
	describe how the powers to appoint and/or remove directors or trustees were allocated among the supported			
	organizations and what conditions or restrictions, if any, applied to such powers during the tax year.	1		
	Did the organization operate for the benefit of any supported organization other than the supported			
	organization(s) that operated, supervised, or controlled the supporting organization? If "Yes," explain in			
	Part VI how providing such benefit carried out the purposes of the supported organization(s) that operated,	_		
	supervised, or controlled the supporting organization.	2		
Seci	tion C. Type II Supporting Organizations		V	
_	When a section to the		Yes	No
	Were a majority of the organization's directors or trustees during the tax year also a majority of the directors			
	or trustees of each of the organization's supported organization(s)? If "No," describe in Part VI how control or management of the supporting organization was vested in the same persons that controlled or managed			
	the supported organization(s).	1		
	tion D. All Type III Supporting Organizations		ш	
000	tion 5.7th Type in Supporting Siguinzations		Yes	No
1	Did the organization provide to each of its supported organizations, by the last day of the fifth month of the		100	110
	organization's tax year, (i) a written notice describing the type and amount of support provided during the prior tax			
	year, (ii) a copy of the Form 990 that was most recently filed as of the date of notification, and (iii) copies of the			
	organization's governing documents in effect on the date of notification, to the extent not previously provided?	1		
	Were any of the organization's officers, directors, or trustees either (i) appointed or elected by the supported			
	organization(s) or (ii) serving on the governing body of a supported organization? If "No," explain in Part VI how			
	the organization maintained a close and continuous working relationship with the supported organization(s).	2		
3	By reason of the relationship described in (2), did the organization's supported organizations have a			
	significant voice in the organization's investment policies and in directing the use of the organization's			
	income or assets at all times during the tax year? If "Yes," describe in Part VI the role the organization's			
	supported organizations played in this regard.	3		
	tion E. Type III Functionally Integrated Supporting Organizations			
1	Check the box next to the method that the organization used to satisfy the Integral Part Test during the yea(see instruc	ctions).		
а	The organization satisfied the Activities Test. Complete line 2 below.			
b	The organization is the parent of each of its supported organizations. <i>Complete line 3 below.</i>		,	
C	The organization supported a governmental entity. Describe in Part VI how you supported a government entity (s	see instructions	$\overline{}$	
2	Activities Test. Answer (a) and (b) below.		Yes	No
	Did substantially all of the organization's activities during the tax year directly further the exempt purposes of			
	the supported organization(s) to which the organization was responsive? If "Yes," then in Part VI identify those supported organizations and explain how these activities directly furthered their exempt purposes,			
	how the organization was responsive to those supported organizations, and how the organization determined			
	that these activities constituted substantially all of its activities.	2a		
	Did the activities described in (a) constitute activities that, but for the organization's involvement, one or more			
	of the organization's supported organization(s) would have been engaged in? If "Yes," explain in Part VI the			
	reasons for the organization's position that its supported organization(s) would have engaged in these			
	activities but for the organization's involvement.	2b		
	Parent of Supported Organizations. Answer (a) and (b) below.			
	trustees of each of the supported organizations? <i>Provide details in Part VI</i> .	3a		
	of its supported organizations? If "Yes," describe in Part VI the role played by the organization in this regard.	3b		

Pa	rt V Type III Non-Functionally Integrated 509(a)(3) Supportin	g Orgai	nizations	
1	Check here if the organization satisfied the Integral Part Test as a qualifyin	g trust on	Nov. 20, 1970 (explain in	Part VI.) See instructions. Al
	other Type III non-functionally integrated supporting organizations must co	mplete Se	ections A through E.	
Sect	ion A - Adjusted Net Income		(A) Prior Year	(B) Current Year (optional)
1	Net short-term capital gain	1		
2	Recoveries of prior-year distributions	2		
3	Other gross income (see instructions)	3		
4	Add lines 1 through 3	4		
5	Depreciation and depletion	5		
6	Portion of operating expenses paid or incurred for production or			
	collection of gross income or for management, conservation, or			
	maintenance of property held for production of income (see instructions)	6		
7	Other expenses (see instructions)	7		
8	Adjusted Net Income (subtract lines 5, 6, and 7 from line 4)	8		
Sect	ion B - Minimum Asset Amount		(A) Prior Year	(B) Current Year (optional)
1	Aggregate fair market value of all non-exempt-use assets (see			
	instructions for short tax year or assets held for part of year):			
а	Average monthly value of securities	1a		
b	Average monthly cash balances	1 b		
С	Fair market value of other non-exempt-use assets	1c		
d	Total (add lines 1a, 1b, and 1c)	1d		
е	Discount claimed for blockage or other			
	factors (explain in detail in Part VI):			
2	Acquisition indebtedness applicable to non-exempt-use assets	2		
3	Subtract line 2 from line 1d	3		
4	Cash deemed held for exempt use. Enter 1-1/2% of line 3 (for greater amount,			
	see instructions)	4		
_5	Net value of non-exempt-use assets (subtract line 4 from line 3)	5		
6	Multiply line 5 by .035	6		
7	Recoveries of prior-year distributions	7		
8	Minimum Asset Amount (add line 7 to line 6)	8		
Sect	ion C - Distributable Amount			Current Year
1	Adjusted net income for prior year (from Section A, line 8, Column A)	1		
2	Enter 85% of line 1	2		
3	Minimum asset amount for prior year (from Section B, line 8, Column A)	3		
4	Enter greater of line 2 or line 3	4		
5	Income tax imposed in prior year	5		
6	Distributable Amount. Subtract line 5 from line 4, unless subject to			
	emergency temporary reduction (see instructions)	6		
7	Check here if the current year is the organization's first as a non-functional	ly integrat	ed Type III supporting org	ganization (see
	instructions).			

Schedule A (Form 990 or 990-EZ) 2017

Par	ιv	Type III Non-Functionally Integrated 509	(a)(3) Supporting Orga	anizations _(continued)	
Secti	on D -	Distributions		,	Current Year
1	Amou	nts paid to supported organizations to accomplish exe	mpt purposes		
2	Amou	nts paid to perform activity that directly furthers exemp	ot purposes of supported		
	organi	izations, in excess of income from activity			
3	Admir	nistrative expenses paid to accomplish exempt purpose	es of supported organization	ns	
4	Amou	nts paid to acquire exempt-use assets			
5	Qualif	ied set-aside amounts (prior IRS approval required)			
6	Other	distributions (describe in Part VI). See instructions.			
7	Total	annual distributions. Add lines 1 through 6.			
8	Distrib	outions to attentive supported organizations to which the	ne organization is responsive	Э	
	(provi	de details in Part VI). See instructions.			
9	Distrib	outable amount for 2017 from Section C, line 6			
10	Line 8	amount divided by line 9 amount			
Secti	on E -	Distribution Allocations (see instructions)	(i) Excess Distributions	(ii) Underdistributions Pre-2017	(iii) Distributable Amount for 2017
1	Distrib	outable amount for 2017 from Section C, line 6			
2	Under	rdistributions, if any, for years prior to 2017 (reason-			
	able c	ause required- explain in Part VI). See instructions.			
3	Exces	s distributions carryover, if any, to 2017			
а					
b	From	2013			
С	From	2014			
d	From	2015			
е	From	2016			
f	Total	of lines 3a through e			
g	Applie	ed to underdistributions of prior years			
h	Applie	ed to 2017 distributable amount			
i	Carry	over from 2012 not applied (see instructions)			
j	Rema	inder. Subtract lines 3g, 3h, and 3i from 3f.			
4	Distrib	outions for 2017 from Section D,			
	line 7:	\$			
а	Applie	ed to underdistributions of prior years			
b	Applie	ed to 2017 distributable amount			
С	Rema	inder. Subtract lines 4a and 4b from 4.			
5	Rema	ining underdistributions for years prior to 2017, if			
	any. S	Subtract lines 3g and 4a from line 2. For result greater			
	than z	ero, explain in Part VI. See instructions.			
6	Rema	ining underdistributions for 2017. Subtract lines 3h			
	and 4	b from line 1. For result greater than zero, explain in			
	Part V	/I. See instructions.			
7	Exces	ss distributions carryover to 2018. Add lines 3j			
	and 4	c.			
8	Break	down of line 7:			
а	Exces	s from 2013			
b	Exces	s from 2014			
С	Exces	s from 2015			
d	Exces	s from 2016			
е	Exces	s from 2017			

Schedule A (Form 990 or 990-EZ) 2017

Schedule B (Form 990, 990-EZ, or 990-PF)

Department of the Treasury Internal Revenue Service

Name of the organization

Schedule of Contributors

➤ Attach to Form 990, Form 990-EZ, or Form 990-PF.

➤ Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047

Employer identification number

2017

PALO ALTO UNIVERSITY, INC. 94-2340692 Organization type (check one): Filers of: Section: X = 501(c)(3) (enter number) organization Form 990 or 990-EZ 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 X 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 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 33 1/3% 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 990-PF, Part I, line 2, to certify that it doesn't meet the filing requirements of Schedule B (Form 990, 990-EZ, or 990-PF).

LHA For Paperwork Reduction Act Notice, see the instructions for Form 990, 990-EZ, or 990-PF. Schedule B (Form 990, 990-EZ, or 990-PF) (2017)

Name of organization Employer identification number

PALO ALTO UNIVERSITY, INC.

94-2340692

Part I	Contributors (see instructions). Use duplicate copies of Part I if additional	I space is needed.	
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
1		\$8,000.	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
2		\$11,000.	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
3		\$	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
4	- Trumo, addi coo, and En 11	\$ 7,001.	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
5		\$ <u>11,943.</u>	Person Payroll Noncash X (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
6		\$5,000.	Person X Payroll Noncash (Complete Part II for noncash contributions.)

Name of organization Employer identification number

PALO ALTO UNIVERSITY, INC.

94-2340692

Part I	Contributors (see instructions). Use duplicate copies of Part I if additional	al space is needed.	
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
7	- Training dudirector, and En 1 1	\$100,000.	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
8		\$	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
9		\$ 7,500.	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
10		\$8,000.	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
11_		\$ 30,000.	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
12		\$\$	Person X Payroll Noncash (Complete Part II for noncash contributions.)

Name of organization Employer identification number PALO ALTO UNIVERSITY, INC. 94-2340692

Part I	Contributors (see instructions). Use duplicate copies of Part I if additional	I space is needed.	
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
13		\$5,000.	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
14		\$	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
15		\$ 88,620.	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
16		\$ <u>150,837.</u>	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
17		\$ <u>213,353.</u>	Person X Payroll
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
18		\$104,549 .	Person X Payroll Noncash (Complete Part II for

PALO ALTO UNIVERSITY, INC.

94-2340692

Part II	Noncash Property (see instructions). Use duplicate copies of Part	II if additional space is needed.	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
_	100 SHARES CHEVRON	_	
5			07/31/18
(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

Employer identification number

Name of organization

Exc	UNIVERSITY, INC. clusively religious, charitable, etc., con	tributions to organizations described	94-2340692 in section 501(c)(7), (8), or (10) that total more than \$				
the	year from any one contributor. Complete	columns (a) through (e) and the follo	wing line entry. For organizations				
	npleting Part III, enter the total of exclusively religion		less for the year. (Enter this info. once.)				
T US	e duplicate copies of Part III if addition	nai space is needed.					
	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is he				
		() = 0	., .				
		(e) Transfer of gif	t				
	Transferee's name, address, a	ind ZIP + 4	Relationship of transferor to transferee				
	(h) Dumage of wife	(0) 110 - of oiff	(d) Description of hours size in the				
<u></u>	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is he				
		(e) Transfer of gif	t				
	(-, 200000 00 3000						
	Transferee's name, address, a	ind ZIP + 4	Relationship of transferor to transferee				
	, ,		•				
	4.5		() 5				
	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is he				
		(e) Transfer of gif	t				
		()					
	Transferee's name, address, a	and ZIP + 4	Relationship of transferor to transferee				
	, ,		•				
-							
<u> </u>		1					
	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is he				
		l					
		(e) Transfer of gif					
		(e) Transier of gir	L				
	Tuemofeueele manna adalus	and 71D : 4	Deletionship of two referents to two referres				
-	Transferee's name, address, a	Inu ZIP + 4	Relationship of transferor to transferee				

SCHEDULE D (Form 990)

Department of the Treasury Internal Revenue Service

Supplemental Financial Statements

► Complete if the organization answered "Yes" on Form 990,
Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b.

► Attach to Form 990.

►Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047 Open to Public Inspection

Name of the organization

PALO ALTO UNIVERSITY TNC. **Employer identification number** 94 - 2340692

Pa	rt I Organizations Maintaining Donor Advised	•	or Accounts. Complete if the
	organization answered "Yes" on Form 990, Part IV, line		•
		(a) Donor advised funds	(b) Funds and other accounts
1	Total number at end of year		
2	Aggregate value of contributions to (during year)		
3	Aggregate value of grants from (during year)		
4	Aggregate value at end of year		
5	Did the organization inform all donors and donor advisors in w	riting that the assets held in donor advise	ed funds
	are the organization's property, subject to the organization's e	_	
6	Did the organization inform all grantees, donors, and donor ac		
	for charitable purposes and not for the benefit of the donor or		
			·
Pa	rt II Conservation Easements. Complete if the organization		
1	Purpose(s) of conservation easements held by the organization	on (check all that apply).	
	Preservation of land for public use (e.g., recreation or ed	ducation) Preservation of a histo	rically important land area
	Protection of natural habitat	Preservation of a certif	
	Preservation of open space		
2	Complete lines 2a through 2d if the organization held a qualifi	ed conservation contribution in the form of	of a conservation easement on the last
	day of the tax year.		Held at the End of the Tax Year
а	Total number of conservation easements		2a
С	Number of conservation easements on a certified historic stru	ıcture included in (a)	2c
d	Number of conservation easements included in (c) acquired a	fter 7/25/06, and not on a historic structu	re
	listed in the National Register		2d
3	Number of conservation easements modified, transferred, rele		
	year ▶		
4	Number of states where property subject to conservation eas	ement is located >	
5	Does the organization have a written policy regarding the peri	odic monitoring, inspection, handling of	
	violations, and enforcement of the conservation easements it	holds?	Yes No
6	Staff and volunteer hours devoted to monitoring, inspecting, h	nandling of violations, and enforcing cons	ervation easements during the year
	>		
7	Amount of expenses incurred in monitoring, inspecting, handle	ling of violations, and enforcing conservat	ion easements during the year
	▶ \$		
8	Does each conservation easement reported on line 2(d) above	•	
	and section 170(h)(4)(B)(ii)?		Yes No
9	In Part XIII, describe how the organization reports conservation	on easements in its revenue and expense	statement, and balance sheet, and
	include, if applicable, the text of the footnote to the organization	on's financial statements that describes t	he organization's accounting for
	conservation easements.	A	
Pa	rt III Organizations Maintaining Collections of	-	ner Similar Assets.
	Complete if the organization answered "Yes" on Form		
1a	If the organization elected, as permitted under SFAS 116 (AS		
	historical treasures, or other similar assets held for public exh	,	nce of public service, provide, in Part XIII,
_	the text of the footnote to its financial statements that describ		
b	If the organization elected, as permitted under SFAS 116 (AS		
	treasures, or other similar assets held for public exhibition, ed	ucation, or research in furtherance of pub	olic service, provide the following amounts
	relating to these items:		
	(i) Revenue included on Form 990, Part VIII, line 1		
_	(ii) Assets included in Form 990, Part X		
2	If the organization received or held works of art, historical trea	·	gain, provide
	the following amounts required to be reported under SFAS 11		> •
a	Revenue included on Form 990, Part VIII, line 1		
b	Assets included in Form 990, Part X		🕨 💲

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule D (Form 990) 2017

_	t III Organizations Maintaining C	ollections of Ar	t, Historical Tr	easures, or O	ther	Similar As	sets	(contir	nued)
3	Using the organization's acquisition, accession	on, and other record	s, check any of the	following that are	a sign	ificant use of	its co	llectio	n items
	(check all that apply):								
а	Public exhibition	d	Loan or exc	hange programs					
b	Scholarly research	е	Other						
С	Preservation for future generations								
4	Provide a description of the organization's co	ollections and explain	n how they further t	he organization's	exemp	t purpose in	Part >	(III.	
5	During the year, did the organization solicit or	r receive donations of	of art, historical trea	sures, or other sir	nilar as	sets			
	to be sold to raise funds rather than to be ma	aintained as part of the	he organization's co	ollection?				Yes	☐ No
Pai	t IV Escrow and Custodial Arran						IV, lin	e 9, or	
	reported an amount on Form 990, Par	t X, line 21.							
1a	Is the organization an agent, trustee, custodi	an or other intermed	iary for contribution	s or other assets	not inc	cluded			
	on Form 990, Part X?							Yes	O No
b	If "Yes," explain the arrangement in Part XIII	and complete the fol	lowing table:						
							A	mount	t
С	Beginning balance					1c			
	Additions during the year					1d			
	Distributions during the year					1e			
f	Ending balance					1f			
2a	Did the organization include an amount on Fo					?		Yes	☐ No
b	If "Yes," explain the arrangement in Part XIII.	Check here if the ex	planation has been	provided on Part	XIII				
Pai	t V Endowment Funds. Complete if	the organization an	swered "Yes" on Fo	orm 990, Part IV, li	ne 10.				
		(a) Current year	(b) Prior year	(c) Two years bac	k (d)	Three years ba	ack (e) Four	years back
1a	Beginning of year balance	2,618,430.	1,428,671.	1,402,61	4.	1,321,49	95.	1	,161,012.
b	Contributions	18,939.	1,102,303.	28	7.	59,42	21.		149,817.
	Net investment earnings, gains, and losses	176,443.	109,479.	25,77	0.	29,6	50.		10,666.
d	Grants or scholarships								
е	Other expenditures for facilities								
	and programs	23,363.	22,023.			7,9	52.		
f	Administrative expenses								
	End of year balance	2,790,449.	2,618,430.	1,428,67	1.	1,402,63	14.	1	,321,495.
2	Provide the estimated percentage of the curr	ent year end balanc	e (line 1g, column (a	a)) held as:					
а	Board designated or quasi-endowment	75.19	%						
b	Permanent endowment > 24.81	%	_						
С	Temporarily restricted endowment ▶	•00 %							
	The percentages on lines 2a, 2b, and 2c show	uld equal 100%.							
За	Are there endowment funds not in the posse	ssion of the organiza	ation that are held a	nd administered f	or the	organization			
	by:								Yes No
	(i) unrelated organizations							3a(i)	X
	(ii) related organizations							3a(ii)	X
b	If "Yes" on line 3a(ii), are the related organiza	tions listed as requir	ed on Schedule R?					3b	
4	Describe in Part XIII the intended uses of the	organization's endo	wment funds.						
Pai	t VI Land, Buildings, and Equipm	ent.							
	Complete if the organization answered	d "Yes" on Form 990	, Part IV, line 11a. S	See Form 990, Par	t X, lin	e 10.			
	Description of property	(a) Cost or ot	ther (b) Cost	or other (c) Accı	ımulated	(0	d) Bool	k value
		basis (investm	nent) basis	(other)	depre	ciation			
1a	Land			0,000.					0,000.
	Buildings		4,79	0,715. 1	.,97	0,950.	2	,81	9,765.
	Leasehold improvements		1	6,534.	1	6,534.			0.
	Equipment				2,26	4,623.	1	,08	2,480.
	Other		2,21	1,000.	94	3,840.	1	, 26'	7,160.
	. Add lines 1a through 1e. (Column (d) must ed		X, column (B), line 1	Oc.)			8	,11:	9,405.

Schedule D (Form 990) 2017

Scne	eaule L	가 (Ի이	rm 990) 2	2017	ΓD
					<u> </u>

Complete if the organization answered "Yes"		ne 11b. See Form 990, Part X, line 12	2
(a) Description of security or category (including name of security)	(b) Book value	(c) Method of valuation: Cost	or end-of-year market value
(1) Financial derivatives			
(2) Closely-held equity interests			
3) Other			
(A)			
(B)			
(C)			
(D)			
(E)			
(F)			
(G)			
(H)			
Total. (Col. (b) must equal Form 990, Part X, col. (B) line 12.) ▶			
Part VIII Investments - Program Related.			
Complete if the organization answered "Yes"	on Form 990, Part IV, li	ne 11c. See Form 990, Part X, line 13	3.
(a) Description of investment	(b) Book value	(c) Method of valuation: Cost	
(1)			
(2)			
(3)			
(4)			
(5)			
(6)			
(7)			
(8)			
(9)			
Total. (Col. (b) must equal Form 990, Part X, col. (B) line 13.) ▶			
Part IX Other Assets.			
Complete if the organization answered "Yes"	on Form 990, Part IV, li	ne 11d. See Form 990, Part X, line 15	5.
	Description		(b) Book value
(1)			
(2)			
(3)			
(4)			
(5)			
(6)			
(7)			
(8)			
(9)			
Total. (Column (b) must equal Form 990, Part X, col. (B) line	2 15)		•
Part X Other Liabilities.			
Complete if the organization answered "Yes"	on Form 990. Part IV. li	ne 11e or 11f. See Form 990. Part X.	line 25.
1. (a) Description of liability		(b) Book value	
(1) Federal income taxes			
(2) PAYABLE TO LENDERS FOR EXC	CESS		
(3) FUNDS TO STUDENTS	0100	10,000.	
DEFERRED COMPENSATION		62,500.	
()		148,104.	
(-)		140,104.	
(6)			
(7)			
(8)			
" · ·	1		

Schedule D (Form 990) 2017

220,604.

Total. (Column (b) must equal Form 990, Part X, col. (B) line 25.) 2. Liability for uncertain tax positions. In Part XIII, provide the text of the footnote to the organization's financial statements that reports the organization's liability for uncertain tax positions under FIN 48 (ASC 740). Check here if the text of the footnote has been provided in Part XIII X

Sche	dule D (Form 990) 2017 PALO ALTO UNIVERSITY, INC.			94-	2340692 Page
Pai	t XI Reconciliation of Revenue per Audited Financial Stateme	ents With	Revenue per F		
	Complete if the organization answered "Yes" on Form 990, Part IV, line 12a				
1	Total revenue, gains, and other support per audited financial statements			1	31,892,147
2	Amounts included on line 1 but not on Form 990, Part VIII, line 12:				
а	Net unrealized gains (losses) on investments	. 2a	79,275	•	
b	Donated services and use of facilities				
С	Recoveries of prior year grants				
d	Other (Describe in Part XIII.)				
е	Add lines 2a through 2d			2e	79,275
3	Subtract line 2e from line 1			3	31,812,872
4	Amounts included on Form 990, Part VIII, line 12, but not on line 1:				
а	Investment expenses not included on Form 990, Part VIII, line 7b	4a			
b	Other (Describe in Part XIII.)		991,322		
С	Add lines 4a and 4b			4c	991,322
5	Total revenue. Add lines 3 and 4c . (This must equal Form 990, Part I, line 12.)			5	32,804,194
Pa	t XII Reconciliation of Expenses per Audited Financial Statem	nents Wit	h Expenses per	r Retu	irn.
	Complete if the organization answered "Yes" on Form 990, Part IV, line 12a				
1	Total expenses and losses per audited financial statements			1	29,829,314
2	Amounts included on line 1 but not on Form 990, Part IX, line 25:				
а	Donated services and use of facilities	2a			
b	Prior year adjustments				
С	Other losses				
d	Other (Describe in Part XIII.)				
е	Add lines 2a through 2d			2e	1 0
3	Subtract line 2e from line 1			3	29,829,314
4	Amounts included on Form 990, Part IX, line 25, but not on line 1:				
а	Investment expenses not included on Form 990, Part VIII, line 7b	4a			
b	Other (Describe in Part XIII.)		727,993		
	Add lines 4a and 4b		•	4c	727,993
5	Total expenses. Add lines 3 and 4c. (<i>This must equal Form</i> 990, <i>Part I, line 18.</i>)			5	30,557,307
Pa	t XIII Supplemental Information.				
	de the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and 4; Part	t IV. lines 1b	and 2b: Part V. line	4: Par	t X. line 2: Part XI.
	2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to provide any add			, ,, , ,	, mio 2, i aic / ii,
PAI	RT V, LINE 4:				
THI	E UNIVERSITY'S ENDOWMENTS CONSIST OF EIGHT	' INDI	/IDUAL FUNI	os,	ALL
ES	ABLISHED TO GENERATE SUPPORT FOR THE UNIV	ERSITY	'S GENERAI	L OP	ERATIONS,
TU:	TION ASSISTANCE AND PROGRAMS. ITS ENDOWME	NT INC	CLUDES DONG	OR-R	ESTRICTED
ENI	OOWMENT FUNDS AND FUNDS DESIGNATED BY THE	BOARD	OF TRUSTER	ES T	O FUNCTION
AS	ENDOWMENTS.				
				_	
PAI	RT X, LINE 2:				
m	INTURDATELY TO DECOGNITION BY MILE INMEDIAL	D = 1.751		- 30	

THE UNIVERSITY IS RECOGNIZED BY THE INTERNAL REVENUE SERVICE AS AN ORGANIZATION EXEMPT FROM INCOME TAXES ON RELATED ACTIVITIES UNDER SECTION 501(C)(3) OF THE INTERNAL REVENUE CODE AND SECTION 23701D OF THE

CALIFORNIA REVENUE AND TAXATION CODE.

Schedule D (Form 990) 2017

SCHEDULE E

(Form 990 or 990-EZ)

Department of the Treasury Internal Revenue Service

Schools

► Complete if the organization answered "Yes" on Form 990, Part IV, line 13, or Form 990-EZ, Part VI, line 48.

➤ Attach to Form 990 or Form 990-EZ.

► Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047

Open to Public Inspection

Name of the organization

PALO ALTO UNIVERSITY, INC. Employer identification number 94 - 2340692

FADO ADIO UNIVERSITI, INC.	± 2340		
art I		VEC	N/
		YES	N
Does the organization have a racially nondiscriminatory policy toward students by statement in its charter, bylaws,		, I	
other governing instrument, or in a resolution of its governing body?	1	Х	
Does the organization include a statement of its racially nondiscriminatory policy toward students in all its brochures,			
catalogues, and other written communications with the public dealing with student admissions, programs, and scholarshi	ps? 2	Х	
Has the organization publicized its racially nondiscriminatory policy through newspaper or broadcast media during the			
period of solicitation for students, or during the registration period if it has no solicitation program, in a way that makes			
the policy known to all parts of the general community it serves? If "Yes," please describe. If "No," please explain.			
If you need more space, use Part II THIS INFORMATION IS INCLUDED IN THE STUDENT HANDBOOK, ON PAU	3	Х	
THIS INFORMATION IS INCLUDED IN THE STUDENT HANDBOOK, ON PAU			
WEBSITE AND IN ALL RECRUITMENT MATERIALS FOR PROSPECTIVE			
STUDENTS.			
Does the organization maintain the following?			
Records indicating the racial composition of the student body, faculty, and administrative staff?		Х	
b Records documenting that scholarships and other financial assistance are awarded on a racially nondiscriminatory basis?		Х	
	l l		l
admissions, programs, and scholarships?	4c	Х	
d Copies of all material used by the organization or on its behalf to solicit contributions?	4c	X	L
admissions, programs, and scholarships?	4c		
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II.	4c		
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to:	4c 4d 4d		2
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges?	4c 4d 4d 5a 5a		X
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies?	4c 4d 4d 5a 5b		_
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff?	4c 4d 4d 5a 5a 5b 5c		2
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff? d Scholarships or other financial assistance?	5a 5b 5c 5d		2 2 2
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff? d Scholarships or other financial assistance? e Educational policies?	5a 5b 5c 5d 5e		Σ Σ Σ
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff? d Scholarships or other financial assistance? e Educational policies? f Use of facilities?	5a 5b 5c 5d 5e 5f		\(\frac{\frac}\frac{\frac}\fint{\frac}\frac{\frac{\frac{\frac{\frac{\frac{\frac{\frac{\frac}\frac{\frac{\frac{\frac{\frac{\frac}\f{\frac{\frac{\frac{\frac{\frac}\f{\frac{\frac{\frac{\fra
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff? d Scholarships or other financial assistance? e Educational policies? f Use of facilities? g Athletic programs?	5a 5b 5c 5d 5e 5f 5g		2 2 2 2 2 2
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff? d Scholarships or other financial assistance? e Educational policies? f Use of facilities? g Athletic programs?	5a 5b 5c 5d 5e 5f 5g		2 2 2 2 2 2 2
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff? d Scholarships or other financial assistance? e Educational policies? f Use of facilities? g Athletic programs? h Other extracurricular activities?	5a 5b 5c 5d 5e 5f 5g		2 2 2 2 2 2 2
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff? d Scholarships or other financial assistance? e Educational policies? f Use of facilities? g Athletic programs? h Other extracurricular activities? If you answered "Yes" to any of the above, please explain. If you need more space, use Part II.	5a 5b 5c 5d 5e 5f 5g 5h	X	2 2 2 2 2 2
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff? d Scholarships or other financial assistance? e Educational policies? f Use of facilities? g Athletic programs? h Other extracurricular activities? If you answered "Yes" to any of the above, please explain. If you need more space, use Part II.	5a 5b 5c 5d 5e 5f 5g 5h 6a		2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff? d Scholarships or other financial assistance? e Educational policies? f Use of facilities? g Athletic programs? h Other extracurricular activities? If you answered "Yes" to any of the above, please explain. If you need more space, use Part II. Does the organization receive any financial aid or assistance from a governmental agency? h As the organization's right to such aid ever been revoked or suspended?	5a 5b 5c 5d 5e 5f 5g 5h 6a	X	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff? d Scholarships or other financial assistance? e Educational policies? f Use of facilities? g Athletic programs? h Other extracurricular activities? If you answered "Yes" to any of the above, please explain. If you need more space, use Part II. Does the organization receive any financial aid or assistance from a governmental agency? Has the organization's right to such aid ever been revoked or suspended? If you answered "Yes" on either line 6a or line 6b, explain on Part II.	5a 5b 5c 5d 5e 5f 5g 5h 6a	X	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
admissions, programs, and scholarships? d Copies of all material used by the organization or on its behalf to solicit contributions? If you answered "No" to any of the above, please explain. If you need more space, use Part II. Does the organization discriminate by race in any way with respect to: a Students' rights or privileges? b Admissions policies? c Employment of faculty or administrative staff? d Scholarships or other financial assistance? e Educational policies? f Use of facilities? g Athletic programs? h Other extracurricular activities? If you answered "Yes" to any of the above, please explain. If you need more space, use Part II. Does the organization receive any financial aid or assistance from a governmental agency? Has the organization's right to such aid ever been revoked or suspended?	5a 5b 5c 5d 5e 5f 5g 5h 6a	X	Σ

SCHEDULE I (Form 990)

Department of the Treasury Internal Revenue Service

Grants and Other Assistance to Organizations, Governments, and Individuals in the United States

Complete if the organization answered "Yes" on Form 990, Part IV, line 21 or 22.

Attach to Form 990.

► Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047

2017

Open to Public

Inspection

Name of the organization **Employer identification number** 94-2340692 PALO ALTO UNIVERSITY, INC. Part I **General Information on Grants and Assistance** Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance? 2 Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States. Grants and Other Assistance to Domestic Organizations and Domestic Governments. Complete if the organization answered "Yes" on Form 990, Part IV, line 21, for any recipient that received more than \$5,000. Part II can be duplicated if additional space is needed. (f) Method of (c) IRC section 1 (a) Name and address of organization (b) EIN (d) Amount of (e) Amount of (a) Description of (h) Purpose of grant valuation (book, or government (if applicable) cash grant non-cash noncash assistance or assistance FMV, appraisal, assistance other) 2 Enter total number of section 501(c)(3) and government organizations listed in the line 1 table Enter total number of other organizations listed in the line 1 table

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule I (Form 990) (2017)

Part III Grants and Other Assistance to Domestic Individuals Part III can be duplicated if additional space is needed.	. Complete if the	organization answe	ered "Yes" on Form 9	990, Part IV, line 22.	
(a) Type of grant or assistance	(b) Number of recipients	(c) Amount of cash grant	(d) Amount of non- cash assistance	(e) Method of valuation (book, FMV, appraisal, other)	(f) Description of noncash assistance
SCHOLARSHIPS, GRANTS AND FINANCIAL AIDS	196	991,322.	0.		
Part IV Supplemental Information. Provide the information req	sional in Double lin	- O. David III alkaras	(l-)	delli and the formation	
Part IV Supplemental Information. Provide the information required PART I, LINE 2:	uired in Part I, iiri	e 2, Part III, Column	(b), and any other a	uditional information.	
THE ORGANIZATION PROVIDES FINANCIA	L AID ON	LY TO OUAL	IFIED STUD	ENTS ENROLLED	
AT THE UNIVERSITY.	<u></u>				
THE ADMISSIONS DEPARTMENT IS RESPO	NSIBLE F	OR MANAGIN	G THE FELL	OWSHIP AND	
SCHOLARSHIP ALLOCATION FOR NEW STU	DENTS. T	HE FACULTY	AND THE A	DMISSIONS	
DEPARTMENT WORK TOGETHER TO AWARD	FELLOWSH	IPS OR SCH	OLARSHIPS	TO NEW	
STUDENTS.					

SCHEDULE J (Form 990)

Compensation Information

For certain Officers, Directors, Trustees, Key Employees, and Highest

Compensated Employees

Complete if the organization answered "Yes" on Form 990, Part IV, line 23. ► Attach to Form 990.

► Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

Open to Public Inspection

Name of the organization

Department of the Treasury

Internal Revenue Service

PALO ALTO UNIVERSITY, INC. **Employer identification number** 94-2340692

Pa	art I Questions Regarding Compensation			
			Yes	No
1 a	Check the appropriate box(es) if the organization provided any of the following to or for a person listed on Form 990,			
	Part VII, Section A, line 1a. Complete Part III to provide any relevant information regarding these items.			
	First-class or charter travel Housing allowance or residence for personal use			
	Travel for companions Payments for business use of personal residence			
	Tax indemnification and gross-up payments Health or social club dues or initiation fees			
	Discretionary spending account Personal services (such as, maid, chauffeur, chef)			
b	If any of the boxes on line 1a are checked, did the organization follow a written policy regarding payment or		77	
	reimbursement or provision of all of the expenses described above? If "No," complete Part III to explain	1b	Х	
2	Did the organization require substantiation prior to reimbursing or allowing expenses incurred by all directors,		37	
	trustees, and officers, including the CEO/Executive Director, regarding the items checked on line 1a?	2	X	
_				
3	Indicate which, if any, of the following the filing organization used to establish the compensation of the organization's			
	CEO/Executive Director. Check all that apply. Do not check any boxes for methods used by a related organization to			
	establish compensation of the CEO/Executive Director, but explain in Part III.			
	X Compensation committee X Written employment contract X Compensation approximately and the second s			
	 Independent compensation consultant Form 990 of other organizations X Compensation survey or study X Approval by the board or compensation committee 			
	Approval by the board or compensation committee			
4	During the year, did any person listed on Form 990, Part VII, Section A, line 1a, with respect to the filing			
7	organization or a related organization:			
а	Receive a severance payment or change-of-control payment?	4a		Х
b	Participate in, or receive payment from, a supplemental nonqualified retirement plan?	4b		Х
C	Participate in, or receive payment from, an equity-based compensation arrangement?	4c		Х
	If "Yes" to any of lines 4a-c, list the persons and provide the applicable amounts for each item in Part III.			
	Only section 501(c)(3), 501(c)(4), and 501(c)(29) organizations must complete lines 5-9.			
5	For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation			
	contingent on the revenues of:			
а	The organization?	5a		X
	Any related organization?	5b		Х
	If "Yes" on line 5a or 5b, describe in Part III.			
6	For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation			
	contingent on the net earnings of:			
а	The organization?	6a		X
b	Any related organization?	6b		Х
_	If "Yes" on line 6a or 6b, describe in Part III.			
7	For persons listed on Form 990, Part VII, Section A, line 1a, did the organization provide any nonfixed payments			v
_	not described on lines 5 and 6? If "Yes," describe in Part III	7		X
8	Were any amounts reported on Form 990, Part VII, paid or accrued pursuant to a contract that was subject to the			v
_	initial contract exception described in Regulations section 53.4958-4(a)(3)? If "Yes," describe in Part III	8		X
9	If "Yes" on line 8, did the organization also follow the rebuttable presumption procedure described in			
	Regulations section 53.4958-6(c)?	9		

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule J (Form 990) 2017

Part II Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees. Use duplicate copies if additional space is needed.

For each individual whose compensation must be reported on Schedule J, report compensation from the organization on row (i) and from related organizations, described in the instructions, on row (ii). Do not list any individuals that aren't listed on Form 990, Part VII.

Note: The sum of columns (B)(i)-(iii) for each listed individual must equal the total amount of Form 990, Part VII, Section A, line 1a, applicable column (D) and (E) amounts for that individual.

(A) Name and Title		(B) Breakdown of W-2 and/or 1099-MISC compensation			(C) Retirement and other deferred	(D) Nontaxable	(E) Total of columns	(F) Compensation in column (B)
		(i) Base compensation	(ii) Bonus & incentive compensation	(iii) Other reportable compensation	compensation	benefits	(B)(i)-(D)	reported as deferred on prior Form 990
(1) MAUREEN O'CONNOR	(i)	403,333.	0.	26,400.	13,667.	10,078.	453,478.	0.
	(ii)	0.	0.	0.	0.	0.	0.	0.
(2) WILLIAM FROMING	(i)	398,935.	0.	160.	7,489.	12,521.	419,105.	0.
PROVOST	(ii)	0.	0.	0.	0.	0.	0.	0.
(3) JUNE KLEIN	(i)	250,055.	0.	160.	12,503.	10,427.	273,145.	0.
VP BUSINESS AFFAIRS/ CFO	(ii)	0.	0.	0.	0.	0.	0.	0.
(4) LULI EMMONS	(i)	170,787.	12,000.	5,600.	9,139.	0.	197,526.	0.
VP OFFICE OF PROF ADVISING & DEVEL	(ii)	0.	0.	0.	0.	0.	0.	0.
(5) ROWENA GOMEZ	(i)	146,165.	13,000.	110,465.	13,452.	87.	283,169.	0.
ASSOCIATE PROFESSOR	(ii)	0.	0.	0.	0.	0.	0.	0.
(6) RICARDO MUNOZ	(i)	235,368.	2,000.	21,151.	12,896.	832.	272,247.	0.
PROFESSOR	(ii)	0.	0.	0.	0.	0.	0.	0.
(7) JAMES BRECKENRIDGE	(i)	249,675.	0.	600.	12,484.	816.	263,575.	0.
DEAN OF ACADEMIC ADMINISTRATION & OP	(ii)	0.	0.	0.	0.	0.	0.	0.
(8) JOYCE MOORE	(i)	114,871.	12,000.	103,014.	10,998.	4,996.	245,879.	0.
ASSOCIATE PROFESSOR	(ii)	0.	0.	0.	0.	0.	0.	0.
(9) PAUL MARCILLE	(i)	152,011.	0.	66,270.	10,884.	87.	229,252.	0.
DIRECTOR, UNDERGRADUATE PROGRAM	(ii)	0.	0.	0.	0.	0.	0.	0.
	(i)							
	(ii)							
	(i)							
	(ii)							
	(i)							
	(ii)							
	(i)							
	(ii)							
	(i)							
	(ii)							
	(i)							
	(ii)							
	(i)							
	(ii)							

Part III Supplemental Information
Provide the information, explanation, or descriptions required for Part I, lines 1a, 1b, 3, 4a, 4b, 4c, 5a, 5b, 6a, 6b, 7, and 8, and for Part II. Also complete this part for any additional information.
PART I, LINE 1A:
MAUREEN O'CONNOR, PRESIDENT, RECEIVED \$105,650 IN TOTAL HOUSING ALLOWANCE
AS PART OF HER COMPENSATION AGREEMENT, WHICH IS PAID DIRECTLY BY THE
SCHOOL.

SCHEDULE 0

Department of the Treasury

Internal Revenue Service

(Form 990 or 990-EZ)

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information.

Attach to Form 990 or 990-EZ. ► Go to www.irs.gov/Form990 for the latest information. OMB No. 1545-0047 Open to Public Inspection

Name of the organization

PALO ALTO UNIVERSITY, INC. **Employer identification number** 94-2340692

FORM 990, PART III, LINE 4A, PROGRAM SERVICE ACCOMPLISHMENTS:
AMERICAN PSYCHOLOGICAL ASSOCIATION, AND OTHER INSTITUTIONS. THE
UNIVERSITY MAINTAINS A DETAILED PUBLIC ACCOUNTING OF ATTRITION, TIME TO
COMPLETION, INTERNSHIP MATCH RATES AND MORE AT
WWW.PALOALTOU.EDU/GRADUATE-PROGRAMS/PHD-PROGRAMS/PHD-CLINICAL-PSYCHOLOG
FORM 990, PART III, LINE 4B, PROGRAM SERVICE ACCOMPLISHMENTS:
30 STUDENTS, GRADUATED 38 STUDENTS, AND EXPERIENCED ZERO WITHDRAWAL OF
THE 174 STUDENTS IN THE PROGRAM (0% ATTRITION). ADDITIONAL OUTCOMES
DATA IS REPORTED ANNUALLY TO WASC, THE DEPARTMENT OF EDUCATION, THE
AMERICAN PSYCHOLOGICAL ASSOCIATION, AND OTHER INSTITUTIONS. THE
UNIVERSITY MAINTAINS A DETAILED PUBLIC ACCOUNTING OF ATTRITION, TIME TO
COMPLETION, INTERNSHIP MATCH RATES AND MORE AT
WWW.PALOALTOU.EDU/GRADUATE-PROGRAMS/PGSP-PSYD-STANFORD-CONSORTIUM/
STUDENT-ADMISSIONS-OUTCOMES-AND-OTHER-DATA
FORM 990, PART III, LINE 4D, OTHER PROGRAM SERVICES:
PAU MASTER'S PROGRAMS:
M.A. IN COUNSELING:
THIS PROGRAM OFFERS AN MASTER OF ARTS IN COUNSELING IN ONE OF TWO AREAS
OF EMPHASIS: "MARRIAGE, FAMILY AND CHILD", OR "CLINICAL MENTAL HEALTH".
BOTH EMPHASIS AREAS ARE CACREP ACCREDITED SINCE JANUARY 2017, AND
PREPARE STUDENTS TO PURSUE LICENSURE IN COUNSELING. THE PROGRAM HAS
BEEN WASC ACCREDITED SINCE 2009 FOR DISTANCE LEARNING, AND SINCE 2011
FOR THE RESIDENTIAL VERSION. DURING THE 17-18 ACADEMIC YEAR, THIS

LHA For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

732211 09-07-17

Schedule O (Form 990 or 990-EZ) (2017)

Name of the organization **Employer identification number** PALO ALTO UNIVERSITY, INC. 94-2340692 PROGRAM WELCOMED A NEW COHORT OF 122 STUDENTS, GRADUATED 92 STUDENTS, EXPERIENCED 21 WITHDRAWALS OF THE 360 STUDENTS IN THE PROGRAM (6% ATTRITION).

M.S. IN PSYCHOLOGY:

THE M.S. IN PSYCHOLOGY IS PRIMARILY A PREPARATORY PROGRAM FOR STUDENTS SEEKING ENTRANCE TO THE PH.D. PROGRAM. PAU WAS GRANTED WASC ACCREDITATION FOR A DISTANCE EDUCATION M.S. IN PSYCHOLOGY DEGREE PROGRAM IN 2000. DURING THE 17-18 ACADEMIC YEAR, THIS PROGRAM WELCOMED A NEW COHORT OF 19 STUDENTS, GRADUATED 10 STUDENTS, EXPERIENCED 7 WITHDRAWALS OF THE 44 STUDENTS IN THE PROGRAM (16% ATTRITION).

PAU UNDERGRADUATE PROGRAMS:

PAU OFFERS TWO SEPARATE DEGREE COMPLETION PROGRAMS AT THE UNDERGRADUATE LEVEL. ENTERING STUDENTS ARE REQUIRED TO HAVE COMPLETED FRESHMAN AND SOPHOMORE GENERAL EDUCATION REQUIREMENTS AT ANOTHER ACCREDITED INSTITUTION. THE UNIVERSITY MAINTAINS COOPERATIVE AGREEMENTS WITH LOCAL COMMUNITY COLLEGES TO OFFER CLASSES FOR THIS PROGRAM ON THEIR CAMPUSES (DE ANZA COLLEGE IN CUPERTINO, FOOTHILL COLLEGE IN LOS ALTOS HILLS, AND COLLEGE OF SAN MATEO IN SAN MATEO), WHICH FACILITATES THE TRANSFER PROCESS AND DEGREE COMPLETION OPTIONS FOR COMMUNITY COLLEGE STUDENTS.

B.S. IN PSYCHOLOGY AND SOCIAL ACTION:

PAU WAS GRANTED WASC APPROVAL FOR A BACHELOR OF SCIENCE IN PSYCHOLOGY AND SOCIAL ACTION ONSITE DEGREE PROGRAM IN 2006, FOLLOWED BY APPROVAL TO OFFER A DISTANCE EDUCATION VERSION STARTING IN 2011. DURING THE 17-18 ACADEMIC YEAR, THIS PROGRAM WELCOMED A NEW COHORT OF 16 STUDENTS, GRADUATED 2 STUDENTS, EXPERIENCED 7 WITHDRAWALS OF THE 47 STUDENTS IN

732212 09-07-17

Name of the organization PALO ALTO UNIVERSITY, INC. Employer identification number 94-2340692

THE PROGRAM (15% ATTRITION).

B.S. IN BUSINESS PSYCHOLOGY:

PAU WAS GRANTED WASC APPROVAL FOR A BACHELOR OF SCIENCE IN BUSINESS

PSYCHOLOGY ONSITE DEGREE PROGRAM IN 2009, FOLLOWED BY APPROVAL TO OFFER

A DISTANCE EDUCATION VERSION STARTING IN 2011. DURING THE 16-17

ACADEMIC YEAR, THIS PROGRAM WELCOMED A NEW COHORT OF 23 STUDENTS,

GRADUATED 9 STUDENTS, EXPERIENCED 6 WITHDRAWALS OF THE 59 STUDENTS IN

THE PROGRAM (10% ATTRITION).

EXPENSES \$ 11,609,415. INCL GRANTS OF \$ 212,680. REVENUE \$ 9,022,614.

FORM 990, PART VI, SECTION A, LINE 2:

RICHARD LONERGAN, TRUSTEE, AND MARILYN LONERGAN, TRUSTEE, HAVE A FAMILY RELATIONSHIP.

FORM 990, PART VI, SECTION B, LINE 11B:

THE COMPLETED FORM 990 WAS REVIEWED BY THE CONTROLLER. AFTER THE CONTROLLER REVIEWED, THE CFO REVIEWED. ANY CHANGES WERE GIVEN TO THE ACCOUNTING FIRM.

THE REVISED FORM 990 WAS REVIEWED BY THE BOARD OF TRUSTEES BEFORE FILING.

FORM 990, PART VI, SECTION B, LINE 12C:

OFFICERS, DIRECTORS/TRUSTEES AND KEY EMPLOYEES ARE REQUIRED TO REVIEW AND SIGN THE CONFLICT OF INTEREST POLICY ANNUALLY. THE ORGANIZATION'S GOVERNING BODY DETERMINES WHETHER A CONFLICT EXISTS. OFFICERS, DIRECTORS/TRUSTEES AND KEY EMPLOYEES AND THE ORGANIZATION'S GOVERNING BODY MONITOR FOR CONFLICT. IF THERE IS A CONFLICT, RESTRICTIONS ARE IMPOSED ON A CASE BY CASE BASIS WITH DIRECTION FROM THE LEGAL COUNSEL.

PALO ALTO UNIVERSITY, INC.	94-2340692
FORM 990, PART VI, SECTION B, LINE 15:	
PAU CONDUCTED ANNUAL CEO AND CFO COMPENSATION REVIEW BASE	D ON MARKET
COMPENSATION REVIEW DATA. THIS RESULTS IN THE PREPARATION	OF A COMPENSATION
REPORT AND UPDATE TO THE COMPENSATION PLAN.	
FORM 990, PART VI, SECTION C, LINE 19:	
GOVERNING DOCUMENTS, FINANCIAL STATEMENTS AND CONFLICT OF	' INTEREST POLICY
ARE ON PALO ALTO UNIVERSITY WEBSITE AND AVAILABLE UPON RE	QUEST FOR THE SAME
PERIOD OF TIME SET FORTH IN SEC. 6104(D).	
FORM 990, PART XI, LINE 9, CHANGES IN NET ASSETS:	
LOSS ON UNCOLLECTIBLE PLEDGES	-263,329.
	_