

Document Retention & Destruction Policy

ADOPTED BY THE BOARD OF DIRECTORS • JULY 20, 2026

Section 1 Purpose & Legal Compliance

This policy establishes standards for the integrity, retention, and destruction of Atlanta Israel Coalition, Inc. (AIC) records. It is designed to comply with Section 802 of the Sarbanes-Oxley Act of 2002, codified at 18 U.S.C. §1519, which makes it a federal crime to knowingly alter, destroy, mutilate, conceal, cover up, or falsify any record with intent to impede or influence “the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States.”

Section 2 Document Retention Schedule

AIC shall retain documents for at least the following minimum periods, set at or above the applicable statutory floors under Georgia and federal law. The board may extend a specific retention window by resolution or under Section 4 (Litigation Hold).

Document class	Specific document types	Retention
Corporate Records	Articles of Incorporation, Bylaws, IRS Form 1023, Determination Letter, Board Minutes, Resolutions, Written Consents, waivers of notice, signed COI Disclosures, signed Code of Conduct	Permanent (O.C.G.A. §14-3-1601(a))
Tax & Finance	IRS Form 990 (all versions), state tax filings, audit reports, general ledgers, annual financial statements	7 Years
Accounting	AP/AR ledgers, bank statements, payment-card statements, reconciliations, cancelled checks, deposit records, invoices, Treasurer's quarterly review records	7 Years
Federal Award & Grant	Grant agreements and subaward terms, expenditure records, supporting documentation, statistical records, reports, equipment and real-property records	3 Years from submission of the final financial report (2 C.F.R. §200.334); equipment / real property: 3 Years after final disposition ; longer where litigation, a claim, or an audit begins first

Document class	Specific document types	Retention
Donor & Gift	Donor databases, contribution records, IRS Forms 8282/8283	7 Years
Restricted-Fund Agreements	Written restricted-gift agreements, donor-restriction correspondence	7 Years after the restriction is satisfied or released
Personnel	Volunteer agreements, contractor files, payroll registers, W-9/1099, performance reviews	4 Years (Treas. Reg. § 31.6001-1(e)(2))
Employment Applications	Resumes, applications, interview notes for un-hired candidates	1 Year
Legal & Contracts	Executed contracts, leases, licenses, partnership agreements	6 Years after fully performed and all sums due and payable (O.C.G.A. § 9-3-24); 20 Years if the instrument recites in its body that it is under seal (§ 9-3-23)
Insurance	Expired policies, accident reports, claims history, active policies	6 Years after policy expiration
Public Relations	Press releases, official public statements	3 Years
Marketing Collateral	Event flyers, social graphics, one-off design assets, campaign templates	1 Year

Section 3 Document Destruction Protocol

Upon expiration of the retention window, documents are destroyed securely: physical records by cross-cut shredding or secure recycling; electronic records by permanent deletion from all local drives, cloud storage, and servers.

Section 4 Litigation Hold

If AIC is served with a lawsuit, receives notice of a government investigation, or has reasonable ground to anticipate a legal dispute:

- All destruction of relevant records stops immediately.
- The Board or legal counsel issues a “Litigation Hold.”
- No director, volunteer, or contractor may destroy, discard, or alter any document covered by the hold.
- Non-compliance results in immediate removal and may carry criminal liability under federal law.