### **EXTENSION ATTACHED**

Form 990

# Return of Organization Exempt From Income Tax

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

OMB No. 1545-0047 2021

Department of the Treasury Internal Revenue Service

Do not enter social security numbers on this form as it may be made public

**Open to Public** Inspection

► Go to www.irs.gov/Form990 for instructions and the latest information. For the 2021 calendar year, or tax year beginning 2021, and ending . 20 D Employer identification number Check if applicable: 13-3610041 Address change Commentary, Inc. 561 7th Avenue, 16th Floor Telephone number Name chance New York, NY 10018 Initial return (212) 891-1400 Final return/terminated G Gross receipts \$ 3,009,748. Amended return H(a) Is this a group return for subordinates? Yes F Name and address of principal officer: Application pending John Podhoretz H(b) Are all subordinates included?
If "No," attach a list. See instructions. Yes Same As C Above 4947(a)(1) or 527 X 501(c)(3) Tax-exempt status: 501(c) ( ) (insert no.) H(c) Group exemption number www.commentary.org Form of organization: X Corporation Trust Other P L Year of formation: 2007 M State of legal domicile: NY Association Summary Briefly describe the organization's mission or most significant activities: The organization publishes a monthly magazine available in print and online. Activities & Governance Check this box ► | if the organization discontinued its operations or disposed of more than 25% of its net assets. Number of voting members of the governing body (Part VI, line 1a)..... Number of independent voting members of the governing body (Part VI, line 1b)..... 9 6 Total number of volunteers (estimate if necessary)..... 7a Total unrelated business revenue from Part VIII, column (C), line 12 68.253 **b** Net unrelated business taxable income from Form 990-T, Part I, line 11...... 0. Prior Year **Current Year** Contributions and grants (Part VIII, line 1h)..... 1,280,756 1,837,928. 9 Program service revenue (Part VIII, line 2g) ..... 914,224. 726,695 137,216. 10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)..... 222,126 11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)..... 11,223. 28,312 Total revenue - add lines 8 through 11 (must equal Part VIII, column (A), line 12)..... 2,257,889 2,900,591. Grants and similar amounts paid (Part IX, column (A), lines 1-3)..... 14 Benefits paid to or for members (Part IX, column (A), line 4)..... 15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5-10)..... 1,901,139 1,833,414. 16a Professional fundraising fees (Part IX, column (A), line 11e)..... **b** Total fundraising expenses (Part IX, column (D), line 25) 17 Other expenses (Part IX, column (A), lines 11a-11d, 11f-24e)..... 1,009,833 1,164,371. 18 Total expenses. Add lines 13-17 (must equal Part IX, column (A), line 25)...... 2,910,972. 2,997,785. Revenue less expenses. Subtract line 18 from line 12..... -653,083. -97,194. **End of Year** Beginning of Current Year Total assets (Part X, line 16)..... 6,537,680. 6,216,451. Total liabilities (Part X, line 26)..... 474,478 379,325. Net assets or fund balances. Subtract line 21 from line 20..... 5,741,973. 6, 158, 355. Signature Block Part II 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 Here John Podhoretz President Type or print name and title 11/10/2022 Michae1 P02024184 Michael Schall self-employed Paid SCHALL & ASHENFARB CPAS LLC Preparer Firm's name Use Only 307 FIFTH AVE 15TH FL Firm's EIN • 13-4036703 Firm's address NEW YORK, NY 10016 Phone no. (212) 268-2800 

# Form **8868**

(Rev. January 2022)

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.
Go to www.irs.gov/Form8868 for the latest information.

OMB No. 1545-0047

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/e-file-providers/e-file-for-charities-and-non-profits.

Automatic 6-Month Extension of Time. Only subr	nit origin	al (no copies needed).								
All corporations required to file an income tax return other the			ps, REMICs, and	i trusts must						
Name of exempt organization or other filer, see instructions.	tax returns	5.	Taxpayer identifical	lion number (TIN)						
Type or										
Commentary, Inc.			13-3610041							
File by the Number, street, and room or suite number. If a P.O. box, see in	structions.		,							
due date for filing your 561 7th Avenue, 16th Floor			<u> </u>							
return. See City, town or post office, state, and ZIP code. For a foreign add instructions.	ress, see instru	ctions.								
New York, NY 10018										
Enter the Return Code for the return that this application is for	or (file a se	parate application for each return)		01						
Application	Return	Application		Return						
ls For	Code	ls For		Code						
Form 990 or Form 990-EZ 01 Form 1041-A										
Form 4720 (individual) 03 Form 4720 (other than individual)										
Form 990-PF	04	Form 5227		10						
Form 990-T (section 401(a) or 408(a) trust)	05	Form 6069	11							
Form 990-T (trust other than above)	Form 8870		12							
Form 990-T (corporation)	07									
Telephone No. ► (212) 891–1401  If the organization does not have an office or place of buse  If this is for a Group Return, enter the organization's four check this box ►	siness in th digit Group	Exemption Number (GEN) . If	f this is for the w	hole group,						
1 I request an automatic 6-month extension of time until for the organization named above. The extension is for   ▶ X calendar year 20 21 or   ▶ tax year beginning , 20	the organiz		zation return							
2 If the tax year entered in line 1 is for less than 12 mont  Change in accounting period	hs, check r	eason: Initial return Fir	nal return							
3 a If this application is for Forms 990-PF, 990-T, 4720, or nonrefundable credits. See instructions	6069, enter	the tentative tax, less any	3 a \$	_0.						
<b>b</b> If this application is for Forms 990-PF, 990-T, 4720, or tax payments made. Include any prior year overpaymen	6069, enter nt allowed a	any refundable credits and estimated s a credit	3b\$	0.						
c Balance due, Subtract line 3b from line 3a. Include you EFTPS (Electronic Federal Tax Payment System). See	r payment instructions	with this form, if required, by using	3c\$	0.						
Caution: If you are going to make an electronic funds withdra payment instructions.	awal (direct	debit) with this Form 8868, see Form 84	153-TE and Form	1 8879-TE for						

Forn	990 (2021)	Commentary, Inc.		13	-3610041	Page 2
Pai	t III Stat	ement of Program Se	rvice Accomplishments			
	Chec	k if Schedule O contains a	response or note to any line in thi	s Part III	<u></u>	
1	Briefly desc	ribe the organization's miss	ion:			
	The org	anization publish	es a monthly magazine	available in print and	online.	
		<del>-</del>				
2	Did the organ	nization undertake any signific	cant program services during the year	r which were not listed on the prior		
	Form 990 o	r 990-EZ?			Yes	X No
	If "Yes," des	cribe these new services on S	Schedule O.			
3	Did the orga	anization cease conducting,	or make significant changes in ho	ow it conducts, any program services	? <b>Yes</b>	X No
	If "Yes," des	cribe these changes on Schei	dule O.			
4	Describe the	e organization's program se	rvice accomplishments for each o	f its three largest program services, a	as measured by ex	xpenses.
	Section 501	(c)(3) and 501(c)(4) organia	zations are required to report the	f its three largest program services, a amount of grants and allocations to o	thers, the total exp	penses,
	and revenue	e, if any, for each program	service reported.			
				<del></del>		
4 a	(Code:		2,353,927. including grants			,224.)
				gazine, COMMENTARY. Com		
				l daily weblogs and oth		. <b>-</b>
	online	material, and it	makes available in el	ectronic form, both the	current pr	int
	issue a	nd the entire pri	nt archive.			
41	(Code:	) (Expenses \$	including grants	of \$ ) (Revenu	ıe \$	)
				, , , , , , , , , , , , , , , , , , , ,		
		~				
4 0	: (Code:	) (Expenses \$	including grants	of \$ ) (Revenu	ıe \$	)
4 (		am services (Describe on S				
	(Expenses	<u> </u>	including grants of \$	) (Revenue \$	)	
4 6	Total progra	am service expenses	2,353,927.			

Part IV | Checklist of Required Schedules Yes No Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If 'Yes,' complete X 1 X 2 Is the organization required to complete Schedule B, Schedule of Contributors? See instructions... 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...... X 3 X 4 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 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, 6 Х 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 Х Did the organization maintain collections of works of art, historical treasures, or other similar assets? If 'Yes,' 8 complete Schedule D, Part III..... Х 8 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 counselling, debt management, credit repair, or debt negotiation Х services? If 'Yes,' complete Schedule D, Part IV...... 9 X If the organization's answer to any of the following questions is 'Yes', then complete Schedule D, Parts VI, VII, VIII, IX, or X, as applicable. a Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If 'Yes,' complete Schedule D, Part VI. 11 a X **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. X 11 b c 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....... X 11 c 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...... X 11 d X e Did the organization report an amount for other liabilities in Part X, line 25? If 'Yes,' complete Schedule D, Part X... 11 e 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.... Х 11 f 12a Did the organization obtain separate, independent audited financial statements for the tax year? If 'Yes,' complete X Schedule D, Parts XI and XII 12a b Was the organization included in consolidated, independent audited financial statements for the tax year? If 'Yes,' and if the organization answered 'No' to line 12a, then completing Schedule D, Parts XI and XII is optional....... X 12b Х 13 Is the organization a school described in section 170(b)(1)(A)(ii)? If 'Yes,' complete Schedule E...... 13 Х 14a Did the organization maintain an office, employees, or agents outside of the United States?...... 14a b Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If 'Yes,' complete Schedule F, Parts I and IV X 14b 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. Х 15 Х 16 Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If 'Yes,' complete Schedule G, Part I. See instructions...... Х 17 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..... Х 18 19 Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If 'Yes,' complete Schedule G, Part III Х 19 Х 20a Did the organization operate one or more hospital facilities? If 'Yes,' complete Schedule H..... 20a b If 'Yes' to line 20a, did the organization attach a copy of its audited financial statements to this return?..... 20b Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or Х domestic government on Part IX, column (A), line 1? If 'Yes,' complete Schedule I, Parts I and II......

			Yes	No
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		Х
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? <i>If</i> 'Yes,' <i>complete Schedule J</i> .	23	x	
24 a	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		х
b	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?	24b		
c	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		
d	Did the organization act as an 'on behalf of' issuer for bonds outstanding at any time during the year?	24d		
25 a	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		Х
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 1	25b		Х
26	Did the organization report any amount on Part X, line 5 or 22, for receivables from or payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons? If 'Yes,' complete Schedule L, Part II	26		X
27	Did the organization provide a grant or other assistance to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor or employee thereof, a grant selection committee member, or to a 35% controlled entity (including an employee thereof) or family member of any of these persons? If 'Yes,' complete Schedule L, Part III.	27		Х
	Was the organization a party to a business transaction with one of the following parties (see the Schedule L, Part IV, instructions for applicable filing thresholds, conditions, and exceptions):			
	A current or former officer, director, trustee, key employee, creator or founder, or substantial contributor? If 'Yes,' complete Schedule L, Part IV	28a		Х
b	A family member of any individual described in line 28a? If 'Yes,' complete Schedule L, Part IV	28b		X
	A 35% controlled entity of one or more individuals and/or organizations described in line 28a or 28b? 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
	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? If 'Yes,' complete Schedule M	30		Х
31	Did the organization liquidate, terminate, or dissolve and cease operations? If 'Yes,' complete Schedule N, Part I	31	_	Х
32	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If 'Yes,' complete Schedule N, Part II.	32		X
33	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? If 'Yes,' complete Schedule R, Part I	33		Х
34	Was the organization related to any tax-exempt or taxable entity? If 'Yes,' complete Schedule R, Part II, III, or IV, and Part V, line 1.	34		Х
	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	35a		Х
b	olf '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? 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 and that is treated as a partnership for federal income tax purposes? If 'Yes,' complete Schedule R, Part VI	37		Х
	Did the organization complete Schedule O and provide explanations on Schedule O for Part VI, lines 11b and 19?  Note: All Form 990 filers are required to complete Schedule O.	38	Х	
Par	t 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			·
1 2	Enter the number reported in box 3 of Form 1096. Enter -0- if not applicable		Yes	No
	a Enter the number reported in box 3 of Form 1096. Enter -0- if not applicable		1	
_	Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming (gambling) winnings to prize winners?	1 c	Х	
BAA	TEEA0104L 09/22/21	Form	990 (	2021)

X

16

17

Form 990 (2021) 13-3610041 Page 5 Commentary, Inc. Part V Statements Regarding Other IRS Filings and Tax Compliance (continued) Yes No 2 a Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return ..... X b If at least one is reported on line 2a, did the organization file all required federal employment tax returns?..... 2 b Note: If the sum of lines 1a and 2a is greater than 250, you may be required to e-file. See instructions. X 3 a Did the organization have unrelated business gross income of \$1,000 or more during the year?........ X **b** If 'Yes,' has it filed a Form 990 T for this year? If 'No' to line 3b, provide an explanation on Schedule 0... 3b 4a At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a X financial account in a foreign country (such as a bank account, securities account, or other financial account)? b If 'Yes.' enter the name of the foreign country See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR). X 5 a Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?..... 5 a X **b** Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?..... 5 b c If 'Yes,' to line 5a or 5b, did the organization file Form 8886-T?..... 5 c 6 a Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions?..... X 6 a b If 'Yes,' did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible? 6 b 7 Organizations that may receive deductible contributions under section 170(c). a Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and X 7 a services provided to the payor?..... **b** If 'Yes,' did the organization notify the donor of the value of the goods or services provided? . . . . . . . 7 b c Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Х 7 c d If 'Yes,' indicate the number of Forms 8282 filed during the year..... 7 d X e Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?. 7 e X f Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?.. 7 f g If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required?..... 7 g h If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a 7h Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year?..... 8 9 Sponsoring organizations maintaining donor advised funds. 9a **b** Did the sponsoring organization make a distribution to a donor, donor advisor, or related person?.... 9 b 10 Section 501(c)(7) organizations. Enter: a Initiation fees and capital contributions included on Part VIII, line 12...... 10a **b** Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities. . . . 11 Section 501(c)(12) organizations. Enter: a Gross income from members or shareholders..... 11 a **b** Gross income from other sources. (Do not net amounts due or paid to other sources against amounts due or received from them.)..... 12a 12a Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041? b 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. a Is the organization licensed to issue qualified health plans in more than one state?..... 13 a 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..... 13 b c Enter the amount of reserves on hand ...... 14a Did the organization receive any payments for indoor tanning services during the tax year?...... X 14a b If 'Yes,' has it filed a Form 720 to report these payments? If 'No,' provide an explanation on Schedule O. 14b 15 Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or X 15 excess parachute payment(s) during the year?..... If 'Yes,' see the instructions and file Form 4720, Schedule N.

16 Is the organization an educational institution subject to the section 4968 excise tax on net investment income?.....

Section 501(c)(21) organizations. Did the trust, any disqualified person, or mine operator engage in any

activities that would result in the imposition of an excise tax under section 4951, 4952, or 4953?.......

If 'Yes,' complete Form 4720, Schedule O.

If 'Yes,' complete Form 6069.

Form 990 (2021) Commentary, Inc. 13-3610041 Page 6 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 on Schedule O. See instructions. Check if Schedule O contains a response or note to any line in this Part VI. Section A. Governing Body and Management No 1 a Enter the number of voting members of the governing body at the end of the tax year. . . . . 8 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 on Schedule O. **b** Enter the number of voting members included on line 1a, above, who are independent. . . . . 7 2 Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other X officer, director, trustee, or key employee? 2 Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors, trustees, or key employees to a management company or other person?..... X 4 Did the organization make any significant changes to its governing documents since the prior Form 990 was filed?..... 4 Х X 5 Did the organization become aware during the year of a significant diversion of the organization's assets?...... 5 X 6 Did the organization have members or stockholders?.... 6 7 a Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more X members of the governing body?.... 7 a b Are any governance decisions of the organization reserved to (or subject to approva! by) members, stockholders, or persons other than the governing body?..... X 8 Did the organization contemporaneously document the meetings held or written actions undertaken during the year by X a The governing body?..... Яa b Each committee with authority to act on behalf of the governing body?..... 86 X 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 on Schedule Q...... X Section 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, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes? 11 a Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form?..... 11 a X **b** Describe on Schedule O the process, if any, used by the organization to review this Form 990. See Schedule O 12a Did the organization have a written conflict of interest policy? If 'No,' go to line 13...... 12 a X b Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?..... 12 b X c Did the organization regularly and consistently monitor and enforce compliance with the policy? If 'Yes,' describe on Schedule O how this was done. See Schedule O. X 120 13 Did the organization have a written whistleblower policy?..... X 13 14 Did the organization have a written document retention and destruction policy?..... X 15 Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision? a The organization's CEO, Executive Director, or top management official.. See . Schedule.. O...... 15a X b Other officers or key employees of the organization..... X 15<sub>b</sub> If 'Yes' to line 15a or 15b, describe the process on 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 X b If 'Yes,' did the organization follow a written policy or procedure requiring the organization to evaluate its participation 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 **Section C. Disclosure** 17 List the states with which a copy of this Form 990 is required to be filed > NY DE 18 Section 6104 requires an organization to make its Forms 1023 (1024 or 1024-A, if applicable), 990, and 990-T (Section 501(c)(3)s only) available for public inspection. Indicate how you made these available. Check all that apply. Another's website X Upon request Own website Other (explain on Schedule O) Describe on Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to 19 the public during the tax year. See Schedule O State the name, address, and telephone number of the person who possesses the organization's books and records

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

- 1 a 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 the 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, Form 1099-MISC, and/or box 1 of Form 1099-NEC) 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.

See the instructions for the order in which to list the persons above.

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

		Т		(C)	<u> </u>					
(A) Name and title	(B) Averag hours per	e tha	an one is both dir	(do n box, h an o rector	not ch unle office /trust		on	(D)  Reportable compensation from the organization	(E) Reportable compensation from related organizations	(F) Estimated amount of other
	week (list an hours for related organizations below dotted line)	director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	(W-2/1099- MISC/1099-NEC)	(W-2/1099- MISC/1099-NEC)	compensation from the organization and related organizations
(1) John Podhoretz	40									
President	0	X		X		Ш		382,567.	0.	28,032.
(2) Carol Moskot Publisher	$-\frac{40}{0}$					х		170,203.	0.	11,322.
(3) Abraham Greenwald Executive Director	$\frac{40}{0}$	-				х		152,011.	0.	12,377.
(4) Ilya Leyzerzon Bookkeeper	$\frac{40}{0}$	-				Х		145,363.	0.	17,351.
(5) Christine Rose Senior Writer	$-\frac{40}{0}$	-				X		148,311.	0.	11,005.
(6) Stephanie Roberts Operations Dir						x		146,332.	0.	12,294.
(7) Daniel R. Benson Chairman	20	×		х				0.	0.	0.
(8) Jay Lefkowitz Member	20	x						0.	0.	0.
(9) Michael W. Schwartz Member	2 0	×						0.	0.	0.
(10) Steven Price	2	X						0.	0.	0.
(11) Gary L. Rosenthal Member	2 0	X	T					0.	0.	0.
(12) Paul J. Isaac Member		X						0.	0.	0.
(13) Michael Leffell Member	$-\frac{2}{0}$	X						0.	0.	0.
(14)										

Form 990 (2021) Commentary, Inc.			_					13-3610041			age 8
Part VII   Section A. Officers, Directors, Tru		Key I			es,	and	d Highest Com	pensated Empl	oyees	(conti	inued)
(A) Name and title	Average hours per week	office	Fot che unless er and	(C) osition ck mor persor a direc	tor/trus	n an itee)	(D)  Reportable compensation from the organization	(E)  Reportable compensation from related organizations (W-2/1099-	( <b>F</b> ) Estimated amount of other compensation from		
	(list any hours for related organiza - tions below dotted line)	monipus busies or director	Corporational business	And ampliance	arphysicalstates	-ome	the organization (W-2/1099- MISC/1099-NEC)	(W-2/1099- MISC/1099-NEC)	the o	nsation rganizal d related anization	tion d
<u>(15)</u>			1								
(16)											
(17)											
(18)		H									
(19)		П									
(20)											
(21)											
(22)											
(23)											
(24)											
(25)											
1 b Subtotal						<b>•</b>	1,144,787.	0.		92,3	381.
c Total from continuation sheets to Part VII, Secti d Total (add lines 1b and 1c)						•	$\frac{0.}{1,144,787.}$	0.		92.3	0. 381.
2 Total number of individuals (including but not limited									ensatio	1	<del>/01.</del>
from the organization 6					_		<u></u>			Yes	No
3 Did the organization list any former officer, direct on line 1a? If 'Yes,' complete Schedule J for suc	tor, <b>t</b> ruste h individu	ee, key ial	emp	oloye	e, or	high	hest compensated	employee	3		X
For any individual fisted on line 1a, is the sum of the organization and related organizations greater	er than \$1	50,00	0? <i>If</i>	'Yes,	' con	ıple	te Schedule J for				
5 Did any person listed on line 1a receive or accru	e comper	sation	fron	n anv	unre	late	ed organization or	individual	5	X	V
for services rendered to the organization? If 'Yes Section B. Independent Contractors	s, compre	ile Sci	leaui	e J 10	n Suc	πр	erson				X
1 Complete this table for your five highest compensation from the organization. Report compensation.	sated ind sation for	epend the ca	ent c lenda	ontra r yea	ctors endi	tha ng v	it received more the with or within the or	nan <b>\$100,000 of</b> ganization's tax year.			
(A) Name and business address						Description of	of services	Compe	) nsatio	n	
		_	_								
2 Total number of independent contractors (including t \$100,000 of compensation from the organization		ited to	those	liste	d abo	ve)	who received more	than			
RAA		TEE AO	001 0	01/20/21		_			Form	000 /	(2021)

			(A) Total revenue	(B) Related or exempt	(C) Unrelated business	(D) Revenue excluded from tax
				function revenue	revenue	under sections 512-514
20	1 a Federated campaigns 1a					
and Other Similar Amounts	b Membership dues					
A	c Fundraising events	482,321.				
lar	d Related organizations 1d					
E.	e Government grants (contributions) 1 e					
b	f All other contributions, gifts, grants, and similar amounts not included above 1 f	1,355,607.				
8	g Noncash contributions included in	1,555,007.				
P	lines 1a-1f		1 027 000			
_	n Total. Add lines la-It	Business Code	1,837,928.	-		
	2a Subscription Revenue	511120	845,971.	845,971.		
1	b Advertising	516110	68,253.	043,311.	68,253.	
3	c	310110	00,200.		00,200.	
2	d					
Program service nevenue	e					
9	f All other program service revenue					
Ĕ	g Total. Add lines 2a-2f	Nevervors sames	914,224.			
	3 Investment income (including dividends, in	terest, and	107.016			127 216
1	other similar amounts) 4 Income from investment of tax-exempt		137,216.			137,216.
	5 Royalties.					
	(i) Real	(ii) Personal	N. S. S. W. S. S.			
	6 a Gross rents					
	b Less: rental expenses 6b					225
	c Rental income or (loss) 6c					
	d Net rental income or (loss)	******				
	7 a Gross amount from (i) Securities	(ii) Other				
	sales of assets other than inventory 7a					
	b Less: cost or other basis					
	and sales expenses 7b c Gain or (loss) 7c	-				
	C. Var. Shirt Anna A. Said	in the state of th				
omer Revenue	8a Gross income from fundraising events (not including \$ 482, 321, of contributions reported on line 1c).					
e	See Part IV, line 18	109,157.				
5	b Less: direct expenses 8t					
5	c Net income or (loss) from fundraising e			THE RESERVE		482,321.
	9 a Gross income from gaming activities. See Part IV, line 19					
	b Less: direct expenses 91					
	c Net income or (loss) from gaming activ	ities				
1	10 a Gross sales of inventory, less					
	b Less: cost of goods sold. 10b					
	c Net income or (loss) from sales of inve					
		Business Code				
ø	11a Other income	511120	11,223.			11,223.
Revenue	b					
3	c					
~	d All other revenue					
	e Total. Add lines 11a-11d		11,223.		42 -4-	
	12 Total revenue. See instructions	9 2 3 2 4 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	2,900,591.	845,971.	68,253.	630,760. Form <b>990</b> (2021)

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) X Check if Schedule O contains a response or note to any line in this Part IX. (D) (A) Total expenses (B) Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII. Management and general expenses Program service Fundraising expenses 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 . . . . . . . Grants and other assistance to foreign organizations, foreign governments, and for-eign individuals. See Part IV, lines 15 and 16 Benefits paid to or for members ..... Compensation of current officers, directors, trustees, and key employees ..... 39,906. 39,906. 399,063 319,251 Compensation not included above to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)...... 0 0 0. 36,908. 160,706. 1,023,409 825,795 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions) ..... 35,818 2,403. 6,275. 44,496. Other employee benefits . . . . . . . 38,505. 273,025. 219,777 14,743. 10 Payroll taxes ..... 5,045. 93,421 75,201 13,175. 11 Fees for services (nonemployees): c Accounting..... e Professional fundraising services. See Part IV, line 17... 17,832 17,832 g Other. (If line 11g amount exceeds 10% of line 25, column (A), amount, list line 11g expenses on Schedule OSCh. 404,588. 343,275 61,313. Advertising and promotion..... 13 Office expenses ..... 63,364. 63,364 14 Information technology...... 15 Royalties..... Occupancy..... 16 205, 196. 165, 176 11,081 28,939. 17 Payments of travel or entertainment expenses for any federal, state, or local public officials..... Conferences, conventions, and meetings.... 19 21 Payments to affiliates..... 22 Depreciation, depletion, and amortization . . . 16,628. 16,628 30,827. 24,814 1,665 4,348. 24 Other expenses. Itemize expenses not covered above. (List miscellaneous expenses on line 24e. If line 24e amount exceeds 10% of line 25, column (A), amount, list line 24e expenses on Schedule O.)..... a Circulation 186.306 186,306 b Website development & maint. 126.455 126,455 c Events\_\_\_\_\_ 81,116 81,116. d Editorial 31,999 31,999 e All other expenses..... 60. 60 25 Total functional expenses. Add lines 1 through 24e. 2,997,785. 2,353,927 372,970. 270,888 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).....

		Check if Schedule O contains a response or note to	o any line i	іл this Part X			
					(A) Beginning of year		(B) End of year
	1	Cash — non-interest-bearing			209,184.	1	525,651.
	2	Savings and temporary cash investments				2	
	3	Pledges and grants receivable, net				3	
	4	Accounts receivable, net			25,748.	4	1,490.
	5	Loans and other receivables from any current or form trustee, key employee, creator or founder, substantia controlled entity or family member of any of these pe	ner officer, I contribute rsons	director, or, or 35%		5	
	6	Loans and other receivables from other disqualified p					19.19.19.19.19.20.20.
	•	section 4958(f)(1)), and persons described in section				6	
	7	Notes and loans receivable, net				7	
60	8	Inventories for sale or use.				8	
Assets	9	Prepaid expenses and deferred charges			FF 11 <i>C</i>	9	
Ass			1 (		55,116.	9	
		Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D		493,927.			
		Less: accumulated depreciation		453,666.	51,022.	10 c	40,261.
	11	Investments — publicly traded securities			3,170,110.	11	4,422,470.
	12	Investments - other securities, See Part IV, line 11.		-	2,644,375.	12	1,486,912.
	13	Investments – program-related. See Part IV, line 11.				13	
	14	Intangible assets				14	
	15	Other assets. See Part IV, line 11			60,896.	15	60,896.
	16	Total assets. Add lines 1 through 15 (must equal line	33)		6,216,451.	16	6,537,680.
	17	Accounts payable and accrued expenses			77,251.	17	6,730.
	18	Grants payable				18	
	19	Deferred revenue			249,900.	19	256,783.
	20	Tax-exempt bond liabilities				20	
es	21	Escrow or custodial account liability. Complete Part				21	
Liabilities	22	Loans and other payables to any current or former of key employee, creator or founder, substantial contribu- controlled entity or family member of any of these pe	ficer, direcutor, or 35	tor, trustee, %		22	
	23	Secured mortgages and notes payable to unrelated the				23	
	24	Unsecured notes and loans payable to unrelated third		-		24	
	25	• •	•				
	26	Other liabilities (including federal income tax, payable and other liabilities not included on lines 17-24). Com Total liabilities. Add lines 17 through 25			147,327. 474,478.	25 26	115,812.
_	20				4/4,4/8.	20	379,325.
nces		Organizations that follow FASB ASC 958, check here and complete lines 27, 28, 32, and 33.		·			
aa	27	Net assets without donor restrictions			5,520,417.	27	5,936,799.
B	28	Net assets with donor restrictions			221,556.	28	221,556.
Net Assets or Fund Bala		Organizations that do not follow FASB ASC 958, che and complete lines 29 through 33.	ck here >				
6	29	Capital stock or trust principal, or current funds				29	
\$	30	Paid-in or capital surplus, or land, building, or equipn		La contraction of the contractio		30	
88	31	Retained earnings, endowment, accumulated income				31	
¥	32	Total net assets or fund balances			5,741,973.	32	6,158,355.
Ne	33	Total liabilities and net assets/fund balances			6,216,451.	33	6,537,680.
BA			TEEA0111L		0,220,1021	· · · · · · · · ·	Form <b>990</b> (2021)

13-3610041 Pa	ge 12
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Forr	n 990 (2021) Commentary, Inc. 13-	3610041		Pa	age 12
Pa	rt XI Reconciliation of Net Assets				
	Check if Schedule O contains a response or note to any line in this Part XI				
1			2,9		
2	Total expenses (must equal Part IX, column (A), line 25)	2	2,9	97.7	785.
3	Revenue less expenses. Subtract line 2 from line 1	3	-	97,1	194.
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A))	4	5,7	41,9	973.
5	Net unrealized gains (losses) on investments	5			576.
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 on Schedule O)	9			0.
10	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 32,				
	column (B))	10	6,1	58,3	355.
Pa	rt XII Financial Statements and Reporting				
	Check if Schedule O contains a response or note to any line in this Part XII				. [
				Yes	
1	Accounting method used to prepare the Form 990: Cash X Accrual Other			7/2	Hill
	If the organization changed its method of accounting from a prior year or checked 'Other,' explain				
	on Schedule O.			9	
2	a 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 reviewe separate basis, consolidated basis, or both:	d on a			
	Separate basis Consolidated basis Both consolidated and separate basis				-
1	b Were the organization's financial statements audited by an independent accountant?		2 b	х	
	If 'Yes,' check a box below to indicate whether the financial statements for the year were audited on a separa			200	
	basis, consolidated basis, or both:			200	
	X   Separate basis			100	
	c If 'Yes' to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant?		2 c	Х	
	If the organization changed either its oversight process or selection process during the tax year, explain on Schedule O.				
3	a As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133?		3 a		Х
Ī	b If 'Yes,' did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why on Schedule O and describe any steps taken to undergo such audits		3 b		

### **SCHEDULE A** (Form 990)

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

2021

Open to Public Inspection

Name	Employer Identification number										
Com	mentary, Inc.					13-361004	1				
Par	Reason for Public Charity	Status. (All o	rganizations must	comple	ete this	part.) See instruc	tions.				
The c	rganization is not a private foundation	because it is: (F	or lines 1 through 12,	check o	nly one	box.)	-				
1	A church, convention of churches, or	association of ch	urches described in sect	ion 170(	b)(1)(A)(	).					
2	A school described in section 170	(b)(1)(A)(ii). (Atta	ach Schedule E (Form	990).)							
3	A hospital or a cooperative hospit	al service organi	zation described in sec	tion 170	(БХ1ХА	)(iii).					
4	A medical research organization on name, city, and state:	_	nction with a hospital of	describe	d in sec	tion 170(b)(1)(A)(iii). E	nter the hospital's				
5	An organization operated for the baction 170(b)(1)(A)(iv). (Comple		ge or university owned				scribed in				
6	A federal, state, or local government	,	ntal unit described in s	ection 1	<b>70(b)(</b> 1)	(A)(v).					
7	An organization that normally receives a substantial part of its support from a governmental unit or from the general public described in section 170(bX1XAXvi). (Complete Part II.)										
8	A community trust described in se	ection 170(b)(1)(A	A)(vi). (Complete Part I	l.)							
9	An agricultural research organization or university or a non-land-grant coll university:										
10	An organization that normally receives (1) more than 33-1/3% of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions, subject to certain exceptions; and (2) no more than 33-1/3% of its support from gross investment income and unrelated business taxable income (less section 511 tax) from businesses acquired by the organization after June 30, 1975. See section 509(a)(2). (Complete Part III.)										
11											
12	An organization organized and operated exclusively for the benefit of, to perform the functions of, or to carry out the purposes of one or more publicly supported organizations described in section 509(a)(1) or section 509(a)(2). See section 509(a)(3). Check the box on lines 12a through 12d that describes the type of supporting organization and complete lines 12e, 12f, and 12g.										
а	Type I. A supporting organization op organization(s) the power to regularl complete Part IV, Sections A and	erated, supervised v appoint or elect	d, or controlled by its sur	ported o	roanizati	on(s), typically by giving	the supported on. <b>You mus</b> t				
b	Type II. A supporting organization management of the supporting organ	supervised or contraction vested in									
c	must complete Part IV, Sections a  Type III functionally integrated. A su organization(s) (see instructions).		ion operated in connectio	n with, ar	nd function	onally integrated with, its	supported				
d	Type III non-functionally integrated.	A supporting orga	anization operated in cor	nection	with its s	supported organization(s)	that is not				
	functionally integrated. The organ instructions). You must complete										
е	Check this box if the organization integrated, or Type III non-functio	nally integrated s	supporting organization	3,			e III functionally				
	Enter the number of supported organ Provide the following information about										
	3	11	<u> </u>			***	45.4				
•	Name of supported organization	(ii) EIN	(iii) Type of organization (described on lines 1-10 above (see instructions))	(lv) la organizat in your g docum	ion listed overning	(v) Amount of monetary support (see instructions)	(vi) Amount of other support (see instructions)				
				Yes	No						
(A)											
(B)											
(C)											
(D)											
(E)											
Total											

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.)

Sec	tion A. Public Support							
begi	ndar year (or fiscal year nning in) ►	(a) 2017	<b>(b)</b> 2018	<b>(c)</b> 2019	(d) 2020	<b>(e)</b> 2021	(f) Total	
1	Gifts, grants, contributions, and membership fees received. (Do not include any 'unusual grants.')	1,050,988.	1,064,700.	1,168,000.	1,280,756.	1,837,928.	6,402,372.	
2	Tax revenues levied for the organization's benefit and either paid to or expended on its behalf						0.	
3	The value of services or facilities furnished by a governmental unit to the organization without charge						0.	
	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)	1,050,988.	1,064,700.	1,168,000.	1,280,756.	1,837,928.	6,402,372. 1,954,965.	
6	Public support. Subtract fine 5 from line 4						4,447,407.	
Sec	tion B. Total Support			_				
	ndar year (or fiscal year nning in)	(a) 2017	<b>(b)</b> 2018	(c) 2019	(d) 2020	(e) 2021	(f) Total	
7	Amounts from line 4	1,050,988.	1,064,700.	1,168,000.	1,280,756.	1,837,928.	6,402,372.	
8	Gross income from interest, dividends, payments received on securities loans, rents, royalties, and income from similar sources	127,832.	130,509.	120,432.	81,870.	137,216.	597,859.	
9	Net income from unrelated business activities, whether or not the business is regularly carried on						0.	
10	Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.)						0.	
11	Total support. Add lines 7 through 10						7,000,231.	
12	Gross receipts from related activ	vities, etc. (see in	structions)			12	3,676,744.	
13	First 5 years. If the Form 990 is organization, check this box and	for the organizati	on's first, second,	third, fourth, or f	ifth tax year as a	section 501(c)(3)	▶ 🗍	
Sec	tion C. Computation of Pu	blic Support F	Percentage					
14	Public support percentage for 20	021 (line 6, colum	n (f), divided by li	ne 11, column (f)	)	14	63.53%	
15	Public support percentage from	2020 Schedule A	Part II, line 14				56.86%	
16a	33-1/3% support test—2021. If t and stop here. The organization	he organization d qualifies as a pu	id not check the b blicly supported o	oox on line 13, and rganization	d line 14 is 33-1/3	3% or more, check	this box	
b	b 33-1/3% support test—2020. If the organization did not check a box on line 13 or 16a, and line 15 is 33-1/3% or more, check this box and stop here. The organization qualifies as a publicly supported organization							
17a	10%-facts-and-circumstances to or more, and if the organization the organization meets the facts	meets the facts-a	ind-circumstances	s test, check this t	box an <b>d stop her</b> e	e, Explain in Part '	VI how	
	10%-facts-and-circumstances to or more, and if the organization organization meets the facts-and	meets the facts-a d-circumstances t	nnd-circumstances est. The organiza	s test, check this t tion qualifies as a	box and stop here publicly supporte	e. Explain in Part 'ed organization	VI how the ▶ □	
18	Private foundation. If the organi	zation did not che	eck a box on line	13, 16a, 1 <b>6</b> b, 17a	, or 17b, check th	is box and see ins	tructions	

Sche	edule A (Form 990) 2021	Commenta	ry, Inc.			13-3610041	Page 3
	t III Support Schedule fo			n Section 509	(a)(2)		
1 (4)	(Complete only if you chec	cked the box on li	ne 10 of Part I or	if the organization	n failed to qualify	under Part II. If the	e organization
	fails to qualify under the to	ests listed below,	please complete	Part II.)	, ,		•
Sec	tion A. Public Support						
	dar year (or fiscal year beginning in)	(a) 2017	<b>(b)</b> 2018	(c) 2019	(d) 2020	(e) 2021	(f) Total
1	Gifts, grants, contributions,	(4) 2017	(3) 2510	(-)	(3) 2323	(5) 252.	(i) rotal
	and membership fees received. (Do not include						
	any 'unusual grants.')						
2	Gross receipts from admissions,						
	merchandise sold or services						
	performed, or facilities furnished in any activity that is	1	Ì				
	related to the organization's						
	tax-exempt purpose						
3	Gross receipts from activities						
	that are not an unrelated trade or business under section 513.						
4	Tax revenues levied for the			<del></del>			
	organization's benefit and						
	either paid to or expended on its behalf					1	
5	The value of services or						
_	facilities furnished by a						
	governmental unit to the organization without charge						
_	•						
6	<b>Total.</b> Add lines 1 through 5  Amounts included on lines 1.				-		
/a	2, and 3 received from						
	disqualified persons						
b	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						
C	Add lines 7a and 7b						
8	Public support. (Subtract line 7c from line 6.)						
Sec	tion B. Total Support						
Caler	dar year (or fiscal year beginning in)	(a) 2017	<b>(b)</b> 2018	(c) 2019	(d) 2020	(e) 2021	(f) Total
	Amounts from line 6				<del>  `                                   </del>	- ` ` -	
	Gross income from interest, dividends.						
	payments received on securities loans, rents, royalties, and income from similar sources			la i			
b	Unrelated business taxable				<del> </del>		
	income (less section 511						
	taxes) from businesses acquired after June 30, 1975						
	Add lines 10a and 10b		_				
11						_	
	activities not included on line 10b,						
	whether or not the business is regularly carried on	1					
12	Other income. Do not include				<del> </del>	-	
12	gain or loss from the sale of						
	capital assets (Explain in		,				
12	Part VI.)						
15	Total support. (Add lines 9, 10c, 11, and 12.)						
14		for the organization	nn's first second	third fourth or t	lifth tax year as a	section 501(c)(3)	
1-4	organization, check this box and						
Sec	tion C. Computation of Pu	blic Support P	ercentage				
	Public support percentage for 20			ne 13. column (f	0)	15	%
16	Public support percentage from	•					90
_	tion D. Computation of Inv					10	
					(6)		
	Investment income percentage f						- 8
	Investment income percentage f						%
19a	<b>33-1/3% support tests—2021.</b> If is not more than 33-1/3%, check						

b 33-1/3% support tests—2020. If the organization did not check a box on line 14 or line 19a, and line 16 is more than 33-1/3%, and line 18 is not more than 33-1/3%, check this box and stop here. The organization qualifies as a publicly supported organization . . . .

Part IV Supporting Organizations

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

# Section A. All Supporting Organizations

			Yes	No
1	Are all of the organization's supported organizations listed by name in the organization's governing documents? If 'No,' describe in <b>Part VI</b> how the supported organizations are designated. If designated by class or purpose, describe the designation. If historic and continuing relationship, explain.	1		
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 <b>Part VI</b> how the organization determined that the supported organization was described in section 509(a)(1) or (2).	2		
3a	Did the organization have a supported organization described in section 501(c)(4), (5), or (6)? If 'Yes,' answer lines 3b and 3c below.	3a		
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 <b>Part VI</b> when and how the organization made the determination.	3b		
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 <b>Part VI</b> what controls the organization put in place to ensure such use.	3c		
4a	Was any supported organization not organized in the United States ('foreign supported organization')? If 'Yes' and if you checked box 12a or 12b in Part I, answer lines 4b and 4c below.	4a		
b	Did the organization have ultimate control and discretion in deciding whether to make grants to the foreign supported organization? If 'Yes,' describe in <b>Part VI</b> how the organization had such control and discretion despite being controlled or supervised by or in connection with its supported organizations.	4b		
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 <b>Part VI</b> 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.	4c		
5a	Did the organization add, substitute, or remove any supported organizations during the tax year? If 'Yes,' answer lines 5b and 5c below (if applicable). Also, provide detail in <b>Part VI</b> , 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).	5a		
Ь	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?	5b		
c	Substitutions only. Was the substitution the result of an event beyond the organization's control?	5c		
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.	6		
7	Did the organization provide a grant, loan, compensation, or other similar payment to a substantial contributor (as 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).	7		
8	Did the organization make a loan to a disqualified person (as defined in section 4958) not described on line 7? If 'Yes,' complete Part I of Schedule L. (Form 990).	8		
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 <b>Part VI.</b>	9a		
ь	Did one or more disqualified persons (as defined on line 9a) hold a controlling interest in any entity in which the supporting organization had an interest? If 'Yes,' provide detail in <b>Part VI</b> .	9b		
C	Did a disqualified person (as defined on 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.	9c		
1 <b>0</b> a	Was the organization subject to the excess business holdings rules of section 4943 because of section 4943(f) (regarding certain Type II supporting organizations)? If 'Yes,' answer line 10b below.	10a		
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.)	10b		

Page 4

3a

3b

a Did the organization have the power to regularly appoint or elect a majority of the officers, directors, or trustees of each of the supported organizations? If 'Yes' or 'No,' provide details in Part VI.

b Did the organization exercise a substantial degree of direction over the policies, programs, and activities of each of its supported organizations? If 'Yes,' describe in Part VI the role played by the organization in this regard.

Schedule A (Form 990) 202	Sch	edule	A (Form	990)	202
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Commentary, Inc.\_

13-3610041

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Pa	rt V Type III Non-Functionally Integrated 509(a)(3) Supporting Orga	nizati	ons	
1	Check here if the organization satisfied the Integral Part Test as a qualifying trust instructions. All other Type III non-functionally integrated supporting organization	t on Nov	v. 20, 1970 (explain ir complete Sections A	Part VI). See through E.
Sec	tion 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		
Sec	tion 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):			
a	Average monthly value of securities	1a		
t	Average monthly cash balances	1b		
	Fair market value of other non-exempt-use assets	1c		
	d Total (add lines 1a, 1b, and 1c)	1d		
•	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 0.015 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 0.035.	6		
7	Recoveries of prior-year distributions	7		
8	Minimum Asset Amount (add line 7 to line 6)	8		
Sec	tion C – Distributable Amount			Current Year
_1	Adjusted net income for prior year (from Section A, line 8, column A)	1		
2	Enter 0.85 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	KIRCH TENEDO	
	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-functionally inte (see instructions).	grated		
BAA			Sch	edule A (Form 990) 2021

Sch	edule A (Form 990) 2021 Commentary, Inc.		13	3-361	0041 Page:
	rt V Type III Non-Functionally Integrated 509(a)(3) Su	pporting Organiza			0012
	tion D – Distributions	<u> </u>		Í	Current Year
1	Amounts paid to supported organizations to accomplish exempt pur	poses		1	
2	Amounts paid to perform activity that directly furthers exempt purposes of in excess of income from activity	2			
3	Administrative expenses paid to accomplish exempt purposes of su	3			
4	Amounts paid to acquire exempt-use assets	4			
5	Qualified set-aside amounts (prior IRS approval required - provide	details in Part VI)		5	
6	Other distributions (describe in Part VI). See instructions.	6			
7	Total annual distributions. Add lines 1 through 6.	7			
8	Distributions to attentive supported organizations to which the organization <b>Part VI</b> ). See instructions.	8			
9	Distributable amount for 2021 from Section C, line 6			9	
10	Line 8 amount divided by line 9 amount			10	
Sec	tion E — Distribution Allocations (see instructions)	(i) Excess Distributions	(ii) Underdistributi Pre-2021	ons	(iii) Distributable Amount for 2021
1	Distributable amount for 2021 from Section C, line 6				
2	Underdistributions, if any, for years prior to 2021 (reasonable cause required — explain in <b>Part VI</b> ). See instructions.				
3	Excess distributions carryover, if any, to 2021				
é	From 2016				
ŀ	From 2017				The state of the s
(	From 2018				
•	From 2019	STEEL STORY			TEST DE MELEUS
	From 2020				
	f Total of lines 3a through 3e				
	Applied to underdistributions of prior years				
	Applied to 2021 distributable amount				

g Applied to underdistributions of prior years	
h Applied to 2021 distributable amount	
i Carryover from 2016 not applied (see instructions)	
j Remainder. Subtract lines 3g, 3h, and 3i from line 3f.	
4 Distributions for 2021 from Section D, line 7:	
a Applied to underdistributions of prior years	
b Applied to 2021 distributable amount	
c Remainder. Subtract lines 4a and 4b from line 4.	
5 Remaining underdistributions for years prior to 2021, if any. Subtract lines 3g and 4a from line 2. For result greater than zero, explain in Part VI. See instructions.	
6 Remaining underdistributions for 2021. Subtract lines 3h and 4b from line 1. For result greater than zero, explain in Part VI. See instructions.	
7 Excess distributions carryover to 2022. Add lines 3j and 4c.	
8 Breakdown of line 7:	
a Excess from 2017	
<b>b</b> Excess from 2018	Part of the last of the last
c Excess from 2019	
d Excess from 2020	

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e Excess from 2021.....

Schedule A (Form 990) 2021

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Part VI

Supplemental Information. Provide the explanations required by Part II, line 10: Part II, line 17a or 17b; Part III, line 12; Part IV, Section A, lines 1, 2, 3b, 3c, 4b, 4c, 5a, 6, 9a, 9b, 9c, 11a, 11b, and 11c; Part IV, Section B, lines 1 and 2; Part IV, Section C, line 1; Part IV, Section D, lines 2 and 3; Part IV, Section E, lines 1c, 2a, 2b, 3a, and 3b; Part V, line 1; Part V, Section B, line 1e; Part V, Section D, lines 5, 6, and 8; and Part V, Section E, lines 2, 5, and 6. Also complete this part for any additional information. (See instructions.)

# SCHEDULE D (Form 990)

**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 2021

Open to Public Inspection
Employer identification number

Department of the Treasury Internal Revenue Service Name of the organization Commentary, Inc.

					3-3610	041	
a	rt   Organizations Maintaining Dono Complete if the organization answ	Advised Funds or Other	Similar Fund	s or Accou	unts.		
_	Complete if the organization answ	(a) Donor advised fu			مام مصما حا	har assa	
1	Total number at end of year	(a) Donor advised to	nus	(b) Fun	ids and ot	ner acco	unts
2	Aggregate value of contributions to (during year).				<del>_</del> _		
3	Aggregate value of grants from (during year).						
4	Aggregate value at end of year						
_	,						
5	Did the organization inform all donors and dor are the organization's property, subject to the				_	Yes	No
6	Did the organization inform all grantees, dono for charitable purposes and not for the benefit impermissible private benefit?	rs, and donor advisors in writin of the donor or donor advisor,	g that grant fund or for any other	s can be use purpose conf	d only ferring	Yes	No
aı	Conservation Easements. Complete if the organization ans	wered 'Yes' on Form 990	. Part IV, line	7.			
1							
	Preservation of land for public use (for exam			ion of a histor	rically imp	ortant la	and area
	Protection of natural habitat		Preservati	ion of a certif	fied histor	ic structi	ure
	Preservation of open space						
2	Complete lines 2a through 2d if the organization last day of the tax year.	neld a qualified conservation con	tribution in the for	m of a conser	vation eas	sement or	n the
	The same same same same same same same sam				Held at th	e End of	the Tax Year
а	Total number of conservation easements						
	Total acreage restricted by conservation ease					_	-
	: Number of conservation easements on a certi						
	Number of conservation easements included	n (c) acquired after 7/25/06, a	ind not on a hist	oric			
	structure listed in the National Register					-	_
	Number of conservation easements modified, tra	nsterred, released, extinguished	or terminated by	the organizat	tion during	) the	
	tax year >						
	Number of states where property subject to cons						
	Does the organization have a written policy re and enforcement of the conservation easeme	egarding the periodic monitoring it holds?	ng, inspection, h	nandling of vi	iolations,	Yes	s No
i	Staff and volunteer hours devoted to monitoring,	inspecting, handling of violation	s, and enforcing	conservation	easement	s during	the year
,	Amount of expenses incurred in monitoring, insp •\$	ecting, handling of violations, a	nd enforcing cons	servation ease	ements du	ring the y	year
	Does each conservation easement reported of and section 170(h)(4)(B)(ii)?	n line 2(d) above satisfy the	requirements of	section 170	(h)(4)(B)(	i) [] Ye	es No
	In Part XIII, describe how the organization re include, if applicable, the text of the footnote conservation easements.	ports conservation easement to the organization's financia	s in its revenue al statements th	and expense at describes	e stateme the organ	ent and the nization's	balance sheet, a s accounting for
ırt	Organizations Maintaining Collection Complete if the organization and	ections of Art, Historica	Treasures,	or Other	Similar	Asset	S.
	If the organization elected, as permitted undensional treasures, or other similar assets he Part XIII the text of the footnote to its finance.	eld for public exhibition, educ	cation, or resear	ie statement rch in further	and bala rance of	ince she public se	et works of art, ervice, provide in
	If the organization elected, as permitted und historical treasures, or other similar assets held following amounts relating to these items:	er FASB ASC 958, to report for public exhibition, education	in its revenue s , or research in f	tatement and furtherance of	d balance f public se	e sheet v ervice, pr	vorks of art, ovide the
(	(i) Revenue included on Form 990, Part VIII	, line 1				. ▶\$	
	(ii) Assets included in Form 990, Part X						
	if the organization received or held works of art,	historical treasures, or other s	imilar assets for			_	wing
	amounts required to be reported under FASE Revenue included on Form 990, Part VIII, lir	•				► S	
	Access included in Form 990 Part Y					·	

Part III Organizations Maintaining Colle	ctions of Art, Histo	rical Treasures, or	Other Similar Ass	ets (continue	d)
3 Using the organization's acquisition, accession, a items (check all that apply):	nd other records, check ar	ny of the following that ma	ke significant use of its of	collection	
a Public exhibition	d Loan o	or exchange program			
b Scholarly research	e Other				
c Preservation for future generations					
4 Provide a description of the organization's collect Part XIII.	ions and explain how they	further the organization's	exempt purpose in		
5 During the year, did the organization solicit or to be sold to raise funds rather than to be ma	intained as part of the o	rganization's collection?			No
Part IV Escrow and Custodial Arrangen line 9, or reported an amount on	nents. Complete if t Form 990, Part X,	he organization ans line 21.	wered 'Yes' on For	m 990, Part	IV,
1 a Is the organization an agent, trustee, custodia on Form 990, Part X?				Yes	No
b If 'Yes,' explain the arrangement in Part XIII a	and complete the following	ng table:	ı		
				Amount	
c Beginning balance			1 c		
d Additions during the year			1d		
e Distributions during the year					
f Ending balance					
2a Did the organization include an amount on Fo				_	No
<b>b</b> If 'Yes,' explain the arrangement in Part XIII.	Check here if the explar	lation has been provided	on Part XIII		
Part V Endowment Funds. Complete if	the ergonization an	swored 'Ves' on For	rm 000 Part IV lin	0.10	
(a) Current			(d) Three years back	(e) Four years t	nack
1 a Beginning of year balance	year (b) Thor year	(c) Two years back	(d) Tillee years back	(e) rour years t	MUN
b Contributions					
c Net investment earnings, gains, and losses					
d Grants or scholarships					
e Other expenditures for facilities and programs					
f Administrative expenses					
g End of year balance					
2 Provide the estimated percentage of the curre	nt year end balance (lin	e 1g, column (a)) held a	is:		
a Board designated or quasi-endowment	8				
b Permanent endowment ►					
c Term endowment ▶ %					
The percentages on lines 2a, 2b, and 2c should e	equal 100%.				
3 a Are there endowment funds not in the possession organization by:	of the organization that a	are held and administered	for the	Yes	No
(i) Unrelated organizations				3a(i)	
(ii) Related organizations				3a(ii)	
b If 'Yes' on line 3a(ii), are the related organiza	tions listed as required of	on Schedule R?		3b	
4 Describe in Part XIII the intended uses of the		ent funds.			
Part VI Land, Buildings, and Equipmen					
Complete if the organization ans	wered 'Yes' on Forr	n 990, Part IV, line	11a. See Form 99	0, Part X, line	e 10.
Description of property	(a) Cost or other basis (investment)	(b) Cost or other basis (other)	(c) Accumulated depreciation	(d) Book valu	16
<b>1 a</b> Land					
<b>b</b> Buildings					
c Leasehold improvements					
d Equipment		493,927.	453,666.	40,2	261.
e Other		(7)			
Total. Add lines 1a through 1e. (Column (d) must e	quai Form 990, Part X, o	column (B), line 10c.)		40,2 ule D (Form 990)	
BAA			Scriedi	י (טבב ווווס ז) עו פוני	LULI

Part VII	Investments - Other Securities.			
	Complete if the organization answered			
	ription of security or category (including name of security)	(b) Book value	(c) Method of valuation: Cost or end-of-	year market value
	ial derivatives			
	y held equity interests.		7 1 - 6 37 M - 1 - 4 37 - 1	
	Alternate Investments		End of Year Market Value	
$\frac{(A)}{(B)}$				
(C)				
(D)				
(E)				
(F)				
(G)				
(H)				
(1)				
	nn (b) must equal Form 990, Part X, column (B) line 12.) 🕨	1,486,912.		
Part VIII	Investments – Program Related. Complete if the organization answered	1 'Vec' on Form 90	N/A	00 Part Y line 13
	(a) Description of investment	(b) Book value	(c) Method of valuation: Cost or end-	
(1)	(C) Description of investment	(D) Doon value	(o) motion of valuation book of one	y your market take
(2)				
(3)		<del> </del>		
(4)				
(5)				
(6)				
(7)				
(8)				
(9)				
(10)				
Part IX	nn (b) must equal Form 990, Part X, column (B) line 13.)  Other Assets.			
railin	Other Assets. Complete if the organization answered	'Yes' on Form 99	0, Part IV, line 11d. See Form 99	0, Part X, line 15.
		escription		(b) Book value
(1)				
(3)				
(4)				
(5)				
(6)				
(7)				
(8)				
(9)				
	olumn (b) must equal Form 990, Part X, column (	(B) (ine 15.)		
Part X	Other Liabilities.	(D) MITO 10.)		<del></del>
I GILX	Complete if the organization answered 'Yes' on	Form 990, Part IV, line 1	le or 11f. See Form 990, Part X, line 25.	
1.		ription of liability		(b) Book value
	eral income taxes			115 010
(3)	erred Rent			115,812.
(4)				
(5)				
(6)				
(7)				
(8)				
(9)				
(10)				
	mn (b) must equal Form 990, Part X, column (B) line 25.)		<b>•</b>	115,812.
	or uncertain tax positions. In Part XIII, provide the text of the f			
	under FASB ASC 740. Check here if the text of the footnote ha	•	-	e Part XIII X

Part XI Reconciliation of Revenue per Audited Financial Statements With Revenue per Return.							
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	3,396,335.					
2 Amounts included on line 1 but not on Form 990, Part VIII, line 12:							
a Net unrealized gains (losses) on investments	6.						
b Donated services and use of facilities							
c Recoveries of prior year grants							
d Other (Describe in Part XIII.)							
e Add lines 2a through 2d.	2e	513,576.					
3 Subtract line 2e from line 1	3	2,882,759.					
4 Amounts included on Form 990, Part VIII, line 12, but not on line 1:							
a Investment expenses not included on Form 990, Part VIII, line 7b	2.						
b Other (Describe in Part XIII.)							
c Add lines 4a and 4b		17,832.					
5 Total revenue. Add lines 3 and 4c. (This must equal Form 990, Part I, line 12.)	5	2,900,591.					
Part XII Reconciliation of Expenses per Audited Financial Statements With Expenses p	er Retu	rn.					
Part XII Reconciliation of Expenses per Audited Financial Statements With Expenses per Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.	er Retu	rn.					
		2,979,953.					
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.							
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.  1 Total expenses and losses per audited financial statements							
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.  1 Total expenses and losses per audited financial statements  2 Amounts included on line 1 but not on Form 990, Part IX, line 25:							
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.  1 Total expenses and losses per audited financial statements  2 Amounts included on line 1 but not on Form 990, Part IX, line 25:  a Donated services and use of facilities							
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.  1 Total expenses and losses per audited financial statements.  2 Amounts included on line 1 but not on Form 990, Part IX, line 25:  a Donated services and use of facilities							
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.  1 Total expenses and losses per audited financial statements  2 Amounts included on line 1 but not on Form 990, Part IX, line 25:  a Donated services and use of facilities  b Prior year adjustments  c Other losses.  2 a  c Other losses.	1						
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.  1 Total expenses and losses per audited financial statements.  2 Amounts included on line 1 but not on Form 990, Part IX, line 25:  a Donated services and use of facilities.	1						
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.  1 Total expenses and losses per audited financial statements 2 Amounts included on line 1 but not on Form 990, Part IX, line 25; a Donated services and use of facilities.  2 b Prior year adjustments.  2 c  C Other losses.  2 c  d Other (Describe in Part XIII.)  2 d  e Add lines 2a through 2d.  3 Subtract line 2e from line 1.  4 Amounts included on Form 990, Part IX, line 25, but not on line 1:	1	2,979,953.					
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.  1 Total expenses and losses per audited financial statements 2 Amounts included on line 1 but not on Form 990, Part IX, line 25: a Donated services and use of facilities b Prior year adjustments c Other losses. 2 b c Other losses. 2 c d Other (Describe in Part XIII.) 2 d e Add lines 2a through 2d. 3 Subtract line 2e from line 1. 4 Amounts included on Form 990, Part IX, line 25, but not on line 1: a Investment expenses not included on Form 990, Part VIII, line 7b. 4 a 17, 83	1 2e 3	2,979,953.					
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.  1 Total expenses and losses per audited financial statements  2 Amounts included on line 1 but not on Form 990, Part IX, line 25:  a Donated services and use of facilities  b Prior year adjustments  c Other losses.  d Other (Describe in Part XIII.)  e Add lines 2a through 2d.  3 Subtract line 2e from line 1.  4 Amounts included on Form 990, Part IX, line 25, but not on line 1:  a Investment expenses not included on Form 990, Part VIII, line 7b.  4 a 17,83  b Other (Describe in Part XIII.)	1 2e 3	2,979,953.					
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.  1 Total expenses and losses per audited financial statements  2 Amounts included on line 1 but not on Form 990, Part IX, line 25:  a Donated services and use of facilities  b Prior year adjustments  c Other losses.  d Other (Describe in Part XIII.)  e Add lines 2a through 2d.  3 Subtract line 2e from line 1.  4 Amounts included on Form 990, Part IX, line 25, but not on line 1:  a Investment expenses not included on Form 990, Part VIII, line 7b.  4 Amounts included on Form 990, Part VIII, line 7b.  4 Amounts included on Form 990, Part VIII, line 7b.  4 Amounts included on Form 990, Part VIII, line 7b.  4 Amounts included on Form 990, Part VIII, line 7b.  4 Amounts included on Form 990, Part VIII, line 7b.  4 Amounts included on Form 990, Part VIII, line 7b.  4 Amounts included on Form 990, Part VIII, line 7b.	1 2e 3 2.	2,979,953. 2,979,953.					
Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.  1 Total expenses and losses per audited financial statements  2 Amounts included on line 1 but not on Form 990, Part IX, line 25:  a Donated services and use of facilities  b Prior year adjustments  c Other losses.  d Other (Describe in Part XIII.)  e Add lines 2a through 2d.  3 Subtract line 2e from line 1.  4 Amounts included on Form 990, Part IX, line 25, but not on line 1:  a Investment expenses not included on Form 990, Part VIII, line 7b.  4 a 17,83  b Other (Describe in Part XIII.)	1 2e 3 2.	2,979,953.					

Provide the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and 4; Part IV, lines 1b and 2b; Part V, line 4; Part X, line 2; Part XI, lines 2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to provide any additional information.

## Part X - FASB ASC 740 Footnote

Commentary does not believe its financial statements include any material, uncertain tax positions. Tax filings for the periods ending December 31, 2018 and later subject to examination by applicable taxing authorities.

# SCHEDULE G (Form 990)

Department of the Treasury Internal Revenue Service

# Supplemental Information Regarding Fundraising or Gaming Activities

Complete if the organization answered 'Yes' on Form 990, Part IV, line 17, 18, or 19, or if the organization entered more than \$15,000 on Form 990-EZ, line 6a.

► Attach to Form 990 or Form 990-EZ.

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

OMB No. 1545-0047

2021

Open to Public Inspection

Commentary, Inc.					13-361004	
Fundraising Activities, Comple	ete if the organiz	ation answe	ered 'Yes'	on Form 990, Part IV, line		
Form 990-EZ filers are not roll indicate whether the organization				owing activities Check	all that apply	
a Mail solicitations	raised funds th	rough arry	e e			
b Internet and email solicitation	ns.		f	Solicitation of gove		
c Phone solicitations			g	Special fundraising	events	
d In-person solicitations						
2 a Did the organization have a written of	or oral agreemen	t with any i	individual (i	including officers, directo	rs, trustees, or key	
employees listed in Form 990, Pa b If 'Yes,' list the 10 highest paid in						
compensated at least \$5,000 by t	he organization		raisers) pu	arsuant to agreements t	under which the fundra	iser is to be
(i) Name and address of individual or entity (fundraiser)	(ii) Activity	(iii) Did have custo of contr	fundraiser dy or control ributions?	(iv) Gross receipts from activity	(v) Amount paid to (or retained by) fundraiser listed in column (i)	(vi) Amount paid to (or retained by) organization
		Yes	No			
1						
						-
2						
		-				
3						
4						
5						
			<del> </del> -			
6						
			<u> </u>			
7						
,						
8						
		+				
9						
10						
10						
Total						0.
<ol><li>List all states in which the organizat or licensing.</li></ol>	tion is registered	or licensed	to solicit o	contributions or has been	notified it is exempt from	n registration
	<del></del>					

Sche	dule	G (Form 990) 2021 Comment	ary, Inc.		13-363	10041 Page 2
Par	t II	Fundraising Events. Complete if t more than \$15,000 of fundraising List events with gross receipts gre	the organization an event contributions	nswered 'Yes' on Fo s and gross income	orm 990, Part IV, li on Form 990-EZ,	ne 18, or reported lines 1 and 6b.
Je Je			(a) Event #1  Special Event (event type)	(b) Event #2	(c) Other events None (total number)	(d) Total events (add column (a) through column (c))
Revenue	1	Gross receipts	591,478.			591,478.
ď	2	Less: Contributions	482,321.			482,321.
	3	Gross income (line 1 minus line 2)	109,157.			109,157.
	4	Cash prizes				
	5	Noncash prizes				
nses	6	Rent/facility costs				
Direct Expenses	7	Food and beverages				
irect	8	Entertainment				
	9	Other direct expenses	109,157.			109,157.
	10 11	Direct expense summary. Add lines 4 thro Net income summary. Subtract line 10 fro				
Par	t III	Gaming. Complete if the organiza \$15,000 on Form 990-EZ, line 6a.	tion answered 'Yes	s' on Form 990, Par	rt IV, line 19, or re	ported more than
Revenue			(a) Bingo	(b) Pull tabs/instant bingo/progressive bingo	(c) Other gaming	(d) Total gaming (add column (a) through column (c))
	1	Gross revenue				
ses	2	Cash prizes				
Exper	3	Noncash prizes				
Direct Expenses	4	Rent/facility costs				
_	5	Other direct expenses				
	6	Volunteer labor	Yes 8	Yes %	Yes %	
	7	Direct expense summary. Add lines 2 thr	ough 5 in column (d)			
	8	Net gaming income summary. Subtract li	ne 7 from line 1, colum	nn (d)		
i	a Is t	er the state(s) in which the organization content organization licensed to conduct gaming lo,' explain:		nese states?		Yes No
		re any of the organization's gaming license	es revoked, suspended,	or terminated during th	ne tax year?	Yes No

Sche	dule G (Form 990) 2021 Commentary, Inc.	13-361	0041	Page 3
11	Does the organization conduct gaming activities with nonmembers?			No
12	Is the organization a grantor, beneficiary or trustee of a trust, or a member of a partnership or other entity formed to administer charitable gaming?		Yes	No
13	Indicate the percentage of gaming activity conducted in:			
	The organization's facility.	. 13a		olo Olo
	An outside facility			
	Enter the name and address of the person who prepares the organization's garning/special events books and record			
	Name •	<b>-</b>		
	Address •			
b	Does the organization have a contract with a third party from whom the organization receives gaming reverse if 'Yes,' enter the amount of gaming revenue received by the organization   and of gaming revenue retained by the third party   f' Yes,' enter name and address of the third party:	nue?	Yes	_
	Name ►			1
	Address •			
16	Garning manager information:			
	Name >	· <b>-</b>		
	Garning manager compensation ► \$			
	Description of services provided			
	Director/officer Employee Independent contractor			
17	Mandatory distributions:			
а	Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license?		Yes	No
t	Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent	n the		
-	organization's own exempt activities during the tax year • \$	-Lucana	(iii) and (	
Par	<b>TIV</b> Supplemental Information. Provide the explanations required by Part I, line 2b, coand Part III, lines 9, 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide a information. See instructions.	ny addi	tional	v),

# **SCHEDULE J** (Form 990)

# **Compensation Information**

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

► Attach to Form 990. ► Go to www.irs.gov/Form990 for instructions and the latest information.

Department of the Treasury Internal Revenue Service Name of the organization

Complete if the organization answered 'Yes' on Form 990, Part IV, line 23.

OMB No. 1545-0047

Open to Public Inspection

Employer Identification number Commentary, Inc.

Part I Questions Regarding Compensation 13-3610041

ai	CIT Questions negationing compensation				
				Yes	No
1 a	Check the appropriate box(es) if the organization provided any of the VII, Section A, line 1a. Complete Part III to provide any relevant	he following to or for a person listed on Form 990, Part 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	olf any of the boxes on line 1a are checked, did the organization following reimbursement or provision of all of the expenses described a		1 b		
2	Did the organization require substantiation prior to reimbursing trustees, and officers, including the CEO/Executive Director, re		2	Х	
3	Indicate which, if any, of the following the organization used to esta Executive Director. Check all that apply. Do not check any box establish compensation of the CEO/Executive Director, but exp				
	X Compensation committee	Written employment contract			
	Independent compensation consultant	Compensation survey or study			
	X Form 990 of other organizations	X Approval by the board or compensation committee			
	During the year, did any person listed on Form 990, Part VII, sorganization or a related organization:  Receive a severance payment or change-of-control payment?		4 a		Х
	Participate in or receive payment from a supplemental nonqua	-	4b		X
	Participate in or receive payment from an equity-based compe	· .	4 c		X
	If 'Yes' to any of lines 4a-c, list the persons and provide the a	pplicable amounts for each item in Part III.			
	Only section 501(c)(3), 501(c)(4), and 501(c)(29) organizations	s must complete lines 5-9.			
5	For persons listed on Form 990, Part VII, Section A, line 1a, did th contingent on the revenues of:	e organization pay or accrue any compensation			
а	The organization?		5 a		Х
ь	Any related organization?		5 b		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 th contingent on the net earnings of:	e organization pay or accrue any compensation			
а	The organization?		6 a		Х
b	a Any related organization?		6 b		Х
7	For persons listed on Form 990, Part VII, Section A, line 1a, c payments not described on lines 5 and 6? If 'Yes,' describe in	did the organization provide any nonfixed Part III	7		х
8	Were any amounts reported on Form 990, Part VII, paid or act to the initial contract exception described in Regulations section if 'Yes,' describe in Part III	crued pursuant to a contract that was subject on 53.4958-4(a)(3)?	8		Х
9	If 'Yes' on line 8, did the organization also follow the rebuttable pre	F			
9	section 53 4958-6(c)?	sumption procedure described in regulations	9		

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

Schedule J (Form 990) 2021

# 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.

	(B) Breakdown of W-2 and/or 1099-MISC and/or 1099-NEC compensation				(D) Nontaxable	(E) Total of columns(B)(i)-(D)	(F) Compensation	
(A) Name and Title	(i) Base compensation	(ii) Bonus & incentive compensation	(iii) Other reportable compensation	(C) Retirement and other deferred compensation	benefits	columns(B)(i)-(D)	in column (В) reported as deferred ол prior Form 990	
John Podhoretz	(i)	382,567.	0.	0.	11,600.	16,432.	410,599.	0.
1 President	(ii)	0.	0.	0.	0.	0.	0.	0.
Ilya Leyzerzon	(i)	145,363.	0.	0.	6,238.	11,113.	162,714.	0.
2 Bookkeeper	(ii)	0.	0.	0.	0.	0.	0.	0.
Carol Moskot	(i)	170,203.	<u> </u>	0.	0.	11,322.	181,525.	0.
3 Publisher	(ii)	0.	0.	0.	0.	0.	0.	0.
Stephanie Roberts	(i)	146,332.	0.	0.	1,300.	10,994.	158,626.	0.
4 Operations Dir	(ii)	0.	0.	0.	0.	0.	0.	0.
Abraham Greenwald	(i)	152,011.	0.	0.	1,300.	11,077.	164,388.	0.
5 Executive Director	(ii)	0.	0.	0.	0.	0.	0.	0.
Christine Rose	(i)	148,311.	0.	0.	0.	11,005.	159,316.	0.
6 Senior Writer	(ii)	0.	0.	0.	0.	0.	0.	0.
	(i)							
7	(ii)							
	(i)							
8	(ii)							
	(i)							
9	(ii)							
	(i)							
10	(ii)						[	
	(1)							
11	(ii)							
	(i)							
12	(ii)							
	(i)							Î
13	(ii)							<b></b>
	(i)							
14	(ii)							
	(i)							
15	(ii)	+						
	(i)							
16	(ii)							
BAA	77		TEEA4102L 10/27	/21			Schedule I	(Form 990) 2021

# 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.

#### SCHEDULE O (Form 990)

# 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 Form 990-EZ.

OMB No. 1545-0047

Department of the Treasury Internal Revenue Service ► Go to www.irs.gov/Form990 for the latest information.

Open to Public Inspection

Name of the organization

Commentary, Inc.

Employer identification number

13-3610041

### Form 990, Part VI, Line 11b - Form 990 Review Process

Prior to being filed with the IRS, a copy of Form 990 will be sent via email to the full board of directors for review and comment. The Form 990 will relect comments received from the board.

### Form 990, Part VI, Line 12c - Explanation of Monitoring and Enforcement of Conflicts

The Board of Commentary, Inc. has adopted a conflict of interest policy. All members of the board execute an annual declaration affirming that they had no conflicts with Commentary (or identifying any such transaction). Stephanie Roberts follows up regularly.

## Form 990, Part VI, Line 15a - Compensation Review & Approval Process - CEO & Top Management

Each year, the executive committee reviews comparable salaries based on a recognized study and reviews the performance of the executive director to determine if the existing salary falls within these ranges. After a deliberation of this matter, a new proposed salary and benefit package is voted on.

#### Form 990, Part VI, Line 19 - Other Organization Documents Publicly Available

The disclosure of governing documents, conflict of interest policy, and financial statements are available to the public upon request.

#### Form 990, Part IX, Line 11g Other Fees For Services

		(A)	(B)	(C)	(D)
			Program	Management	Fund-
		<u>Total</u>	<u>Services</u>	_& General_	<u>raising</u>
print authors fees		343,275.	343,275.		
Professional fees		61,313.		61,313.	
	Total \$	404,588.	\$ 343,275.	\$ 61,313.	\$ 0.