

## Kymm Wilson (Kymm Wilson)

> Everybodys Cool International (Entity #6350466) hereby submits this comment in support of the initial regulatory framework for SB 253. While we fall below the mandatory reporting threshold, we have officially adopted the "ATB Framework" which mandates a 70/30 capital allocation model and rigorous data transparency.

> We are voluntarily aligning our organizational reporting with the proposed Scope 1 and Scope 2 disclosure standards to ensure restorative accountability and mission integrity. We support the Board's efforts to establish consistent reporting deadlines (such as the proposed August 10, 2026 date) and fee structures that prioritize transparency. Our organization remains committed to providing verified, high-integrity data to the public docket in good faith.

## OPERATIONAL METHODOLOGY: THE ATB FRAMEWORK

Everybodys Cool International (Entity #6350466)

### I. GOVERNANCE MANDATE

This document constitutes the official Operational Methodology of Everybodys Cool International, as adopted by the Board of Directors on November 2, 2024. This framework is a binding governing instrument that dictates how the corporation manages assets, verifies its mission, and ensures restorative accountability.

### II. THE 70/30 CAPITAL ALLOCATION MODEL

To ensure maximum charitable impact and organizational sustainability, the corporation strictly adheres to a mandated revenue split:

- 70% Restricted Mission Fund: Seventy percent (70%) of all gross programmatic revenue is restricted to direct charitable activities, community restoration, and the fulfillment of the organization's core purpose.
- 30% Operational Sustainability Fund: Thirty percent (30%) of gross revenue is allocated to operational overhead, administrative compliance, and the long-term sustainability of the methodology.

### III. ADVERSARIAL AUDIT & VERIFICATION (THE "BREAKER TEAM")

Integrity is maintained through a proprietary verification process known as the "Breaker Team" protocol:

1. Independent Verification: A designated internal or external audit function must "stress-test" all programmatic claims.
2. Mission Alignment Check: Every major expenditure must be cross-referenced against the organization's restorative goals.
3. Transparency Reporting: Verified results of these audits are to be summarized and maintained for public disclosure and state regulatory review.

### IV. RESTORATIVE ACCOUNTABILITY PROTOCOLS

In the event of an operational variance or a failure to meet the 70/30 mandate:

- Automatic Correction: The organization must immediately trigger a "Restorative Correction," redirecting a compensatory amount of operational funds back into the Restricted Mission Fund.

- Root Cause Analysis: A formal report must be generated to identify the systemic failure, which is then shared with the Board to prevent recurrence.

#### V. DATA ACCOUNTABILITY (SB 253 ALIGNMENT)

The organization voluntarily adopts the data reporting rigor of the California Climate Corporate Data Accountability Act (SB 253). This ensures that all organizational outputs—environmental or social—are tracked with the same level of precision required of major corporate entities, ensuring a "Good Faith" standard of transparency.

#### VI. BOARD CERTIFICATION

We, the Board of Directors, certify that this methodology is the foundational operational standard for Everybodys Cool International.

Date: February 7, 2026

Authorized Signature: \_\_\_\_\_

Name/Title: Kymm Wilson, Incorporator

Everybodys Cool International (Entity #6350466) is a California nonprofit public benefit corporation. The foundational documents provided for this registration include:

1. Articles of Incorporation: The endorsed document filed with the California Secretary of State.

## ARTICLES OF INCORPORATION

OF

EVERYBODYS COOL INTERNATIONAL

### Article I: Name

The name of this corporation is Everybodys Cool International.

### Article II: Purpose

This corporation is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the Nonprofit Public Benefit Corporation Law for charitable and educational purposes.

The specific purpose of this corporation is to develop and implement the ATB Framework, a methodology for systemic integrity and restorative accountability. The corporation is dedicated to:

1. Providing research and public access to foundational governance tools and ethical frameworks.
2. Implementing a mandated 70/30 Capital Allocation Model where 70% of gross programmatic revenue is restricted to direct charitable impact and 30% is allocated to operational sustainability.
3. Conducting independent mission verification through adversarial audit protocols.
4. Aligning organizational transparency with high-level data accountability standards, including the principles set forth in California SB 253.

### Article III: Service of Process

The name of the initial agent for service of process in the State of California is Kymm Wilson. The address of the initial agent is 10209 Dante Avenue, Oakland, CA 94603.

## Article IV: Governance

This corporation is organized exclusively for charitable purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code. No substantial part of the activities of this corporation shall consist of carrying on propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate or intervene in any political campaign on behalf of any candidate for public office.

## Article V: Dissolution

The property of this corporation is irrevocably dedicated to charitable purposes and no part of the net income or assets of this corporation shall ever inure to the benefit of any director, officer, or member thereof or to the benefit of any private person. Upon the dissolution of this corporation, its assets remaining after payment of all debts and liabilities shall be distributed to a nonprofit fund, foundation, or corporation which is organized and operated exclusively for charitable purposes and which has established its tax-exempt status under Section 501(c)(3) of the Internal Revenue Code.

## CERTIFICATE OF INCORPORATOR

I hereby declare that I am the person who executed the foregoing Articles of Incorporation, which execution is my act and deed.

Kymm Wilson, Incorporator

2. Corporate Bylaws: The internal governing rules adopted on November 2, 2024, outlining board structure and officer duties.

## BYLAWS

OF

EVERYBODYS COOL INTERNATIONAL

(A California Nonprofit Public Benefit Corporation)

## ARTICLE 1: NAME AND OFFICES

The name of this corporation is Everybodys Cool International. The principal office for the transaction of the business of the corporation is located at 10209 Dante Avenue, Oakland, CA 94603.

## ARTICLE 2: PURPOSES

The specific purpose of this corporation is to develop and implement the ATB Framework, a methodology for organizational integrity and restorative accountability. The corporation is organized exclusively for charitable and educational purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code.

#### ARTICLE 3: DIRECTORS

- Section 3.1 Number: The corporation shall have no less than three (3) and no more than seven (7) directors.
- Section 3.2 Terms: Directors shall serve for a term of six (6) years. There are no limits on the number of terms a director may serve.
- Section 3.3 Powers: All corporate powers shall be exercised by or under the direction of the Board of Directors.
- Section 3.4 Quorum: A majority of the directors then in office shall constitute a quorum for the transaction of business.

#### ARTICLE 4: OFFICERS

The officers of the corporation shall be a President, a Secretary, and a Treasurer (or Chief Financial Officer).

- President: The President is the general manager and chief executive officer of the corporation and has general supervision over its affairs.
- Secretary: The Secretary shall keep the minutes of all meetings and maintain corporate records.
- Treasurer: The Treasurer shall keep and maintain adequate and correct accounts of the properties and business transactions of the corporation.

#### ARTICLE 5: OPERATIONAL MANDATES (ATB FRAMEWORK)

The Board of Directors officially adopts the ATB Framework as the mandatory operational standard. This includes:

1. 70/30 Capital Model: 70% of gross programmatic revenue is restricted to direct mission impact; 30% is reserved for organizational sustainability.
2. Verification: The authorization of an independent audit function to verify financial and mission alignment.

#### ARTICLE 6: RECORDS AND REPORTS

The corporation shall maintain (a) adequate and correct books and records of account; (b) written minutes of the proceedings of its Board and committees; and (c) a record of each director's name and address.

## ARTICLE 7: AMENDMENTS

These bylaws may be adopted, amended, or repealed by a majority vote of the Board of Directors.

## CERTIFICATE OF SECRETARY

I, the undersigned, certify that I am the currently acting Secretary of Everybodys Cool International, a California nonprofit public benefit corporation, and that the above Bylaws are the bylaws of this corporation as adopted by the Board of Directors on February 6, 2026.

Ralph Bessard, Secretary

3. Operational Methodology Addendum: The formal board-adopted framework governing the organization's specialized programmatic mandates and 70/30 capital model.

## METHODOLOGY: THE ATB FRAMEWORK FOR SYSTEMIC INTEGRITY

### Section 1: Foundational Principles & Core Mechanics

The ATB Framework is built on the principle that systemic integrity is a dynamic, verifiable state achieved through transparent protocols and recursive feedback. The methodology operates through four interdependent mechanical systems:

1. The Vow (The Immutable Standard): A publicly documented covenant that defines the non-negotiable standards for ethical, social, environmental, and financial integrity for all participating entities. This serves as the central datum for all measurement.
2. The Invitation Protocol (The Signal Intake): An open-source, sovereign gateway that accepts and catalogs petitions regarding potential harm, omission, or violation from any source—human community, algorithmic guardian, or internal system.
3. The Breaker Team (The Adaptive Immune Response): A permanently funded, operationally independent adversarial audit function. This team conducts unscheduled, hostile audits of any entity or instrument certified under The Vow. Its findings and raw data trails are published in real-time to a public ledger. Its purpose is not to punish flaws but to treat them as critical system data.

4. The Market of Reconciliation (The Capital Translation Layer): A suite of financial instruments (e.g., Integrity Swaps, Vow-Backed Securities) designed to translate verification events from the Breaker Team into calibrated capital responses, providing continuous price discovery for integrity and risk.

## Section 2: The Operational Sequence (The Recursive Loop)

The Framework executes through a defined, recurring cycle:

1. Signal Introduction: A petition is submitted via the Invitation Protocol.
2. Resonance Check: The Breaker Team assesses if the signal vibrates against the standards of The Vow.
3. Verification & Publication: An audit is conducted. All findings are published to the immutable public ledger.
4. Market Translation: Financial instruments within the Market of Reconciliation automatically adjust, pricing the new, verified truth into the capital ecosystem.
5. Restorative Mandate Execution: Algorithmic protocols are triggered, mandating specific actions (e.g., creating a community trust fund, archiving a memory monument) to repair the identified harm.
6. System Update: The Framework's own protocols are updated based on the learning, hardening the system against future identical failures.

## Section 3: Implementation & Protocol Integration

This section details the integration of the Framework's mechanics into the operational fabric of the founding entity and its subsidiaries.

- 3.1 Subsidiary Governance (The "ATB LLC" Model): For any subsidiary or protected entity (e.g., Attempt to Balance LLC), governance is expressly subservient to this Methodology. The subsidiary's operating agreement must codify the authority of the Breaker Team for audit, adherence to Restorative Mandates, and a profit-distribution model that flows a majority of capital to the nonprofit's mission.
- 3.2 The 70/30 Capital Allocation Protocol: A minimum of 70% of all gross program revenue generated through Framework activities is legally restricted for direct mission impact via the Restorative Mandate. The remaining 30% is allocated to organizational sustainability, including the perpetual funding of the Breaker Team.
- 3.3 Data Conduit & SB 253 Alignment: The organization voluntarily structures its internal data architecture to align with the disclosure requirements of California SB 253. This creates a verifiable, public data conduit that feeds the Invitation Protocol and provides the material for Breaker Team verification, turning a compliance mandate into a foundational

input for systemic integrity.

#### Section 4: Governance & The Observer's Seat

Governance of the Framework itself is maintained through a council featuring a neutral, non-voting Observer seat. This Observer's sole function is to witness and formally attest that each operational cycle—from Signal Introduction to System Update—was conducted without procedural breach, ensuring the mechanism's purity remains its primary product.

#### Section 5: Integration with Founding Entity (Everybody's Cool International)

As the originating and governing entity, Everybody's Cool International instantiates and enforces this methodology. The organization's Articles, Bylaws, and internal protocols legally mandate the 70/30 revenue allocation, establish the Breaker Team's authority, and require that all programmatic activities utilize the Framework's recursive loop for verification and impact.