\$30M military wreath charity buys solely from its founders' farm

By <u>Leo Shane III</u> Dec 13, 2023



A volunteer lays a wreath on the grave of an unknown service member in Arlington National Cemetery on Dec. 13, 2014, as part of a Wreaths Across America event. (Rachel Larue/Marine Corps)

When trucks from <u>Wreaths Across America</u> roll into <u>Arlington National</u> <u>Cemetery</u> on Thursday, they'll bring with them the largest army of volunteers and the most substantial supply of holiday wreaths in the charity's 15 years of operation.

They're also poised to write their biggest check ever to their sole wreath supplier, a Maine company owned by the founders of the charity whose main source of income is donations to the non-profit. <u>Wreaths Across America</u> and the <u>Worcester Wreath Company</u> are open about the relationship, advertising for each other on their websites. Both have <u>filed appropriate disclosures and tax forms</u> and have received no pushback from the Internal Revenue Service or state tax officials.

But as the operation has grown from a regional volunteer effort to a nationwide campaign bringing in more than \$30 million annually — more than double its 2017 total — so have <u>questions about whether the</u> <u>close ties</u> between the non-profit group and for-profit company undercut the charitable message of the effort.

"You often see a small charity where some of the insiders still work for a related company or the founders and get paid," said Brian Mittendorf, the H.P. Wolfe chair in accounting at Ohio State's Fisher College of Business. "The unusual part here is the scale. That an organization of this size would still have such a large portion of its budget in the form of transactions with related persons raises questions."

The idea for Wreaths Across America grew from a decision by Worcester Wreath owner Morrill Worcester in the 1990s to donate extra holiday wreaths to Arlington National Cemetery. As the tradition attracted more attention, the company split off the work into a charitable arm, still maintaining ties with its founders.

Over the years, major donors such as American Airlines, Chevrolet and Jersey Mike's Subs have handed over hundreds of thousands of dollars. In contrast to the early years of the operation, today the two entities have flipped roles, with the charity drawing national headlines and the private wreath firm relying mostly on the organization for revenue. "If it is the case that the for-profit vendor would collapse or need to significantly downsize were it to lose the business of the charity, it is a glaring conflict of interest to have owners of that vendor on the charity's board or in key staff positions," said Laurie Styron, CEO and executive director of <u>CharityWatch</u>, an independent charity watchdog group.

"The owners and their close relatives should either sell off their financial interests in the for-profit vendor, or the interested parties should resign from the charity and allow an independent board to recruit leaders in whom the public can have confidence in their capacity to act independently."

Buying wreaths

The charity's goals and operations are straightforward. The group has a stated mission to "remember the men and women who served our country, honor our military and their families, and teach our children about our freedom and those who protect it."

Charity officials say they try to advance those goals through a series of education events throughout the year, but the wreath distribution every December is its highest profile initiative. Nearly 3 million volunteers are expected to take part in wreath laying activities this weekend.

The arrival of wreaths at Arlington Cemetery this week is a multi-day media event, with lengthy rules for an expected rush of news crews and photojournalists documenting the thousands of volunteers and wreaths.

Individuals and groups who participate in Wreaths Across America events each December receive all of their wreaths through the charity.

Donors pay \$17 for each one, with \$5 going back to civic and youth groups helping with sales. WAA officials say that arrangement has raised \$22 million over the last 15 years for local charities and civic groups beyond wreath laying activities.

In fiscal 2021, the charity sent nearly \$21.5 million to Worcester Wreath. Company officials have said publicly that the Wreaths Across America contract makes up more than 75% of their annual revenue.

Worcester Wreath officials said they donate 30% of their profits to the charity and other local veterans groups, but much of that profit comes from the contract with WAA. This year, the charity expects to place nearly 3 million wreaths on gravesites at more than 4,200 locations nationwide, all bought from the Maine supplier.

Four board members of Wreaths Across America — including Karen Worcester, the executive director — are related to the owners of Worcester Wreath. Charity officials in tax filings say those members "recused themselves from discussion and vote of the agreement between the organization and Worcester Wreath."



Ceremonial wreaths are on display during a Wreaths Across America event at Fort Wright Cemetery in Spokane, Washington, Dec. 17, 2022. Wreaths Across America honors military members and their families for their service and sacrifice. (U.S. Air Force photo by Airman 1st Class Stassney Davis)

Amber Caron, director of communications for WAA, said the wreath production contract is handled by a third-party vendor and overseen by a special subcommittee of the board.

"This process is public and executed every three years," she said. "It is open to any wreath company to submit a bid, nationwide. Up until this point, it has not been deemed necessary by the [subcommittee] and advisor to have more than one vendor to meet the needs of the program."

Caron said if the charity's third-party advisers recommend moving away from Worcester Wreath or adding other companies to help with the inventory, "we will consider all options that are in the best interest of the organization." But thus far, that has not happened. Wreaths laid in cemeteries as far away as California or Montana are shipped from the Worcester Wreath property in Maine through a series of donated and contracted shipping arrangements. Costs associated with the "Honor Fleet," as WAA leaders call them, are factored into the sponsorship packages.

Charitable concerns

The financial relationship between Worcester Wreath and Wreaths Across America has been whispered about in the veterans community, but has not led to any public confrontations. The charity counts dozens of high-profile military and veterans support groups among their partners, and thousands of their members will be among the volunteers laying wreaths this weekend. The Military Times Foundation donated \$15,000 in free advertising to Wreaths Across America in 2023.

Paul Streckfus, editor of EO Tax Journal, said the Internal Revenue Service does not require that a tax-exempt organization have an independent board or exclude employees whose family members may have related business interests. Such arrangements may draw extra scrutiny, he added, but in themselves are not improper.

Mittendorf, however, said a separate issue is the idea of groups breaking faith with donors who believe their charitable contributions are being spent to maximize the good done, and not to support forprofit ventures.

"They have an obligation to support their public purpose, and to avoid appearances of conflicts of interest in that," he said. "Even if they're operating in a way that doesn't cross into something that's impermissible, it may create an appearance of conflict of interest. And that makes it difficult in trying to maintain public trust."

CharityWatch has written about concerns regarding WAA and Worcester Wreath. Styron, the CEO, said given the connections between the two, the non-profit should be following more rigorous auditing and reporting practices to prove it is operating responsibly.

"There is too much financial interest concentrated in one family's company to inspire confidence that the charity's board will act with true independence given the close family ties the charity reports among key staff," she said.

A volunteer army

Wreath laying events connected with the charity are organized through local site officials, and not through the Department of Veterans Affairs or DOD as a whole. Officials at Arlington National Cemetery — the largest single site event — said they have no consultation with Wreaths Across America on their internal operations.

Arlington cemetery staffers do help publicize the annual wreath laying and coordinate with the WAA on logistics of the event. But in a statement, cemetery officials said that "the wreaths are not purchased by the Army, therefore the usual laws and regulations regarding Department of Defense procurements are not applicable."

About 60,000 volunteers are expected at the cemetery on Saturday for this year's wreath layings, making it one of the busiest days of the year at the hallowed site. Caron said another 4,217 sites have signed up to participate in the event as well, up more than 500 from 2022.

Ahead of this year's event, Wreaths Across America sent 13 tractor trailers carrying wreaths, Gold Star family members and corporate sponsor signs through eight states and the District of Columbia.

The caravan, which launched Sunday from Harrington, Maine — home of Worcester Wreath — is scheduled to arrive at Arlington Cemetery on Thursday morning.

About <u>Leo Shane III</u>

Leo covers Congress, Veterans Affairs and the White House for Military Times. He has covered Washington, D.C. since 2004, focusing on military personnel and veterans policies. His work has earned numerous honors, including a 2009 Polk award, a 2010 National Headliner Award, the IAVA Leadership in Journalism award and the VFW News Media award.