




CP:E:EO:T:2

SEP 27 1996

Employer Identification Number: 
Key District: Northeast (Brooklyn, NY)
Form: 1120
Tax Years: 1989-1995

Dear Applicant:

This letter constitutes a final adverse ruling with respect to your claim of exemption from federal income taxation under section 501(c)(9) of the Internal Revenue Code.

We make our ruling for the following reasons: Your primary activity is the operation of a golf tournament. You have also made substantial charitable contributions. Therefore, substantially all of your operations are not in furtherance of providing permissible benefits, as required by section 501(c)(9) of the Code and the regulations thereunder.

The Code and the regulations issued thereunder require that you file federal income tax returns. Based upon the financial information that you furnished, you should file returns on the form and for the tax years indicated above within 30 days from the date of this letter with your key District Director for exempt organization matters, shown above, unless you request and your key District Director grants an extension of time to file the returns. You should file returns for later tax years with the appropriate service center indicated in the instructions for those returns.

If you have any questions concerning the reasons for this ruling, please contact the person whose name and telephone number appear in the heading of

[REDACTED]

this letter. You should address questions concerning the filing of returns to your key District Director.

Sincerely,

[REDACTED]
Acting Chief, Exempt Organizations
Technical Branch 2

Code	CP: E: EO: T: 2	CP: E: EO: T: 2		
Surname	[REDACTED]	[REDACTED]		
Date	9/26/96	9-27-96		