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EP-EO DIV.

JUL 21 1987

DIST. DIR. OF INT. REV.  
BROOKLYN, N. Y. 11201  
EP-EO  
Tech Section

Employer Identification Number: [Redacted]  
Tax Years: All Years

Dear Applicant:

This is our final adverse ruling as to your exempt status under section 501(c)(3) of the Internal Revenue Code.

This ruling is made for the following reasons: You are a wholly owned subsidiary and an integral part of [Redacted], a governmental body, and are not therefore a counterpart of an organization described in section 501(c)(3) of the Code. The facts also indicate that your only purpose is to act as a conduit through which [Redacted] pays its union employees. This operation does not constitute a charitable activity. Finally, your organizing document does not limit your purposes to one or more exempt purposes, nor does it contain a dissolution clause.

However, the income of your organization is excludable from gross income under section 115 of the Code, and contributions or gifts to your organization are deductible by donors under section 170(c)(1) of the Code subject to the limitation under section 170(b)(1)(B) of the Code.

If you decide to contest this ruling under the declaratory judgment provisions of section 7428 of the Code, you must initiate a suit in the United States Tax Court, the United States Claims Court, or the District Court of the United States for the District of Columbia before the 91st day after the date that this ruling was mailed to you. Contact the clerk of the appropriate court for rules for initiating suits for declaratory judgment.

[REDACTED]

In accordance with section 1406(c) of the law, the appropriate state officials will be notified of this action.

If you have any questions about this ruling, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,

(signed) [REDACTED]

[REDACTED]  
Chief, Exempt Organizations  
Conference and Service Branch

cc: [REDACTED]

2cc: [REDACTED]

cc: [REDACTED]

[REDACTED]