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TAX EXEMPT AND
GOVERNMENT ENTITIES
DIVISION

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

Date: MAY 27 2004

UIL: 501.00-00

Employer Identification Number:

Form:

Tax Years:

Contact Person:

Ellen S. Berick

Identification Number:

Telephone Number:

Dear Applicant:

This letter constitutes a final adverse ruling with respect to your claim of exemption from federal income taxation under section 501(c)(4) of the Internal Revenue Code.

We make our ruling for the following reason: You have not established that you are operated exclusively for the promotion of social welfare. You have not established that you are not operated primarily to carry on commercial activity, nor have you established that your earnings do not inure to the benefit of private individuals.

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, unless you request and are granted an extension of time to file the returns. You should attach a copy of this letter to the returns you file. Questions concerning the filing of returns should be directed to the Ohio Tax Exempt and Government Entities (TE/GE) office at 877-829-5500 (a toll free number).

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 this letter.

DR-057-2004

Sincerely,

A handwritten signature in black ink, appearing to read "J. Chasin".

Joseph Chasin, Manager
Exempt Organizations
Technical Group 2