

EP/EO Information Report

File Folder Number (EP)

Forward Report to:

Source of Information:

- Application Request
- Amendment
- Prior Year Examination
- Related Examination
- Unrelated Examination
- Other (Indicate Below)

Organization / Taxpayer / Employer Name

Street Address

City, State, ZIP Code

EIN / SSN / EIN - Plan No.

Tax Period(s)

Form Number

Future Year (EO)

Future Year Code (EO)

1120

Information

The [redacted] exemption request has been denied. The effective date of the denial is [redacted]. A copy of the denial ltr. has been attached. The Denial is retroactive to [redacted]. The org. is liable for filing Form 1120. Financial info (proposed budgets) have been attached.

Prepared by:

Date:

Organization Code

Initiating Activity

Phone No.

By:

Date:

Address of Initiating Activity

Action: (Attach Additional Documents if Necessary)

Signature

Date

Phone No.

EDS - EXEMPT ORGANIZATION CASE CLOSING SHEET

Case No: [REDACTED] FFN: [REDACTED] EDS Screener's ID: [REDACTED]

Relation:

EIN: [REDACTED] Control Date: [REDACTED] Case Grade: 12 508 Date: [REDACTED]

Name Control: [REDACTED]
Organization Name: [REDACTED]

Form No: 1023
Type Request: I
Acct Period: [REDACTED]
IRC Code: 03
Prin Act Code: [REDACTED]
NTEE:

Address: [REDACTED]

DBA:

Current Status: 02

EO/BMF

Filing Req - 941: 1120: 01 1041: 1065: 940:
990C: 990T: 5227: 990PF: 990: 09

Employment Cd:
Class Cd: 1000 Determination Cd: 70 Effective Dt: [REDACTED]
Affiliation Cd: 3 Ruling Dt: [REDACTED]
Foundation Cd: 0 Advance Ruling Ends: 0
Deductibility Cd: 2 Deductibility Yr: 0 Activity Cds: [REDACTED] 000 000
Entity Type: 5 District Of Location: [REDACTED] Pension Plan: 2
Group Exemption No: 0

Items indicated by the following paragraph codes are missing:

DATE: [REDACTED] 02 CLOSING CODE: 02 SPECIALIST: [REDACTED] HOURS: 6.0 CLOSING LTR: 55
48 REVIEWER: [REDACTED] HOURS: 3.0

COMMENTS:

Managers Initials: _____

Inserts

The evidence presented disclosed that you were formed on [redacted] as an association in [redacted].

The purpose for which the association was formed is to build and deliver to [redacted] a handicapped accessible facility at [redacted] in [redacted].

The primary activity of [redacted] is to improve the quality of life for [redacted] who became a quadriplegic as a result of a diving accident in [redacted]. The entity intends to modify/re-design the family home to make it a handicapped accessible facility for [redacted]. The association also plans to purchase [redacted] a computer to aid him in finding employment as well as provide him with entertainment.

[redacted] will engage in fundraising activities which will enlist the aid of private

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businesses and organizations to provide goods, services, money and sponsorships of fundraising events such as dances, flea markets and raffles. The organization's support will include individual donations as well. Your disbursements will consist of fundraising expenses, modification of the home and the purchase of the computer.

Denial Caveats — #1, #2, #3, #3, #7, #8

An organization is organized exclusively for one or more exempt purposes only if its Articles of Organization limit the purposes of such organization to one or more exempt purpose and do not expressly empower the organization to engage, other than as an insubstantial part of its activities, in activities which themselves are not in furtherance of one or more exempt purposes.

The organization's organizing document does not limit its purposes to those

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described under section 501(c)(3) of the Code and including a dissolution provision dedicating assets to an exempt purpose. Therefore, the association known as "████████████████████" fails to meet the organizational test requirements of section 1.501(c)(3)-1(b) of the regulations.

An organization will be regarded as operated exclusively for one or more exempt purposes only if it engages primarily in activities which accomplish one or more exempt purposes specified in section 501(c)(3). The prohibition against private inurement specified in regulations 1.501(c)(3)-1(c)(2) states that an organization is not operated exclusively for one or more exempt purpose if its net earnings inure in whole or in part to the benefit of private individuals.

The funds will be used to make contributions solely for the personal expenses of ██████████ to improve his life as a handicapped

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individual. [REDACTED] will be the sole recipient of any contributions paid by the entity. Clearly, such activities do not establish that the general public is being served, but rather the private interests of an individual.

Therefore, we have determined that this organization fails to meet both the organizational and operational tests required to receive exempt status under Section 501(c)(3) of the Internal Revenue Code.

Denial Caveat #34 insert → 501(c)(3)

Close Denial Ltr #1