



TAX EXEMPT AND  
GOVERNMENT ENTITIES  
DIVISION

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

Date: [REDACTED]

Employer Identification Number:  
[REDACTED]

Form:  
[REDACTED]

Tax Years:  
[REDACTED]

Contact Person:  
[REDACTED]

Identification Number:  
[REDACTED]

Telephone Number:  
[REDACTED]

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 reason(s):

- You have failed to establish that you are an association of employees with an employment-related common bond.
- You have failed to establish that your net earnings do not inure to the benefit of shareholders, officers, and highly compensated employees.
- You have failed to establish that you do not provide impermissible benefits.

In making this ruling, we note that you have failed to respond to our request for an employee census indicating, for each participant, the participant's salary, whether the participant is a business owner, and the type of policy covering the participant, i.e., whether whole-life or term.

We also note that you have failed to correct your Trust Agreement to provide loan standards that permit a definite determination that loans will conform to the meaning of "other benefits" under section 1.501(c)(9)-3(d) of the Income Tax Regulations.

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).

[REDACTED]

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.

Sincerely,

[REDACTED]

[REDACTED]  
Manager, Exempt Organizations  
Technical Group [REDACTED]

[REDACTED]