

[REDACTED]

[REDACTED]

Employer Identification Number: [REDACTED]
Key District: [REDACTED]
Form: 1041
Tax Years: 1997 and subsequent years

Dear Applicant:

This letter constitutes a final adverse ruling with respect to your application for recognition of exemption from federal income taxation under sections 501(c)(25) and 501(c)(2) of the Internal Revenue Code.

We make our ruling for the following reason(s):

Your parent is a section 501(c)(5) labor organization, thus you do not meet the technical requirements for exemption under section 501(c)(25)(C) of the Code. We have also considered exemption under section 501(c)(2) of the Code as an alternative. Because your activities exceed the type of activities permitted a section 501(c)(2) title holding company you do not qualify for exemption under section 501(c)(2) of the Code.

Pursuant to section 512(b)(13) of the Code, your parent, [REDACTED], should file Form 990Ts for any year in which you make distributions to it and its net income exceeds \$1000. However, your returns reflect that you never have made any distributions to [REDACTED] and that you have zero net trust income. In addition, we explained to you how [REDACTED] could make use of your losses if it had other unrelated business taxable income reportable on Form 990T.

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 Form 1041 for the tax years indicated above 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 this letter. You should address

[REDACTED]

questions concerning the filing of returns to your District Director.

Sincerely yours,

[REDACTED]

[REDACTED]

[REDACTED]

Exempt Organizations

cc: [REDACTED]

cc: [REDACTED]

[REDACTED]

[REDACTED]