



TAX EXEMPT AND
GOVERNMENT ENTITIES
DIVISION

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

Date: MAY - 9 2002

[REDACTED]

Employer Identification Number:

[REDACTED]

Form:

1120.

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)(4) of the Internal Revenue Code.

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

We have concluded that since you are carrying on your activities with the general public in a manner similar to organizations operated for profit, and that your income has inured to the benefit of a private shareholder, you are not described as a social welfare organization within the meaning of section 501(c)(4) of the Code. Accordingly, we hereby affirm our denial of your application for recognition of exemption from federal income tax under section 501(c)(4).

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.

Sincerely yours,

(signed) Terrell M. Berkovsky

Terrell M. Berkovsky
Manager, Exempt Organizations
Technical Group 2

[REDACTED]

[REDACTED]