

[REDACTED]

[REDACTED]
[REDACTED]

SEP 27 1996

CP:E:EO:T:2

Employer Identification Number: [REDACTED]
Key District: Southeast (Baltimore, MD)
Form: 1041
Tax Years: All Years

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.

Our adverse ruling of [REDACTED], was based on the basis that you are providing for deferred compensation which is a nonqualifying benefit under section 1.501(c)(9)-3(f) of the Income Tax Regulations. We also determined that you were in violation of the disproportionate benefits and inurement provisions of section 1.501(c)(9)-4(b) of the regulations. In addition, we determined that your plan did not meet the discrimination requirements of section 505 of the Code.

You filed a timely protest of our adverse ruling and a conference was held with your representative on [REDACTED]. You submitted post-conference information. After careful consideration of your protest and the post-conference information, we continue to conclude that our adverse letter of [REDACTED], is correct.

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 with your key District Director for exempt organization matters, shown above, unless you request and your key District Director grants an extension of time to file the returns. You should file returns for later tax years with the appropriate service center indicated in the instructions for those returns.

[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. You should address questions concerning the filing of returns to your key District Director.

Sincerely,

(signed) [REDACTED]

[REDACTED]
Acting Chief, Exempt Organizations
Technical Branch 2

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