

[REDACTED]
[REDACTED]
[REDACTED]

JUL 29 1991

[REDACTED]

CERTIFIED MAIL

Dear Applicant:

We have completed our review of the application for recognition of exemption under section 501(c)(4) of the Internal Revenue Code.

The evidence submitted indicates that you were incorporated under the provisions of Title, [REDACTED], as a corporation pursuant to Title [REDACTED], Corporations, General, of the [REDACTED] Statutes. The purpose for which the corporation is organized are: To do any lawful act or thing for which corporations may be organized pursuant to the provisions to Title [REDACTED], Corporations General, of the [REDACTED] Statutes. The corporation shall have the authority to issue [REDACTED] shares of stock each of which shall have no par value.

You state in your application that [REDACTED] was formed to organize litter clean-ups at recreational areas throughout [REDACTED]. [REDACTED] was the first pickup organized. The organization recruits volunteers and environmental groups to assist in the cleanup each year.

Income is expected from corporate and public sponsorships. Expenses will be for postage, travel, refreshments and reimbursement to [REDACTED] for administrative expenses.

Section 501(c)(4) of the Code provides for the exemption from federal income tax of civic leagues or organizations not organized for profit but operated exclusively for the promotion of social welfare.

Section 1.501(c)(4)-1(a)(2)(1) of the Income Tax Regulations provides that an organization is operated for the promotion of social welfare if it promotes, in some way, the common good and general welfare of the people of the community. An organization described in this section is one which is operated for the purpose of bringing about civic betterments and social improvements.

Code	Initiator	Reviewer	Reviewer	Reviewer	Reviewer	Reviewer
	[REDACTED]	[REDACTED]	[REDACTED]			
Surname	[REDACTED]	[REDACTED]	[REDACTED]			
Date	7/29/91	7/29/91	7/29/91			

[REDACTED]

Our review of your articles of incorporation indicates that you have incorporated under the for profit statutes of the State of [REDACTED] rather than the nonprofit law. Therefore, while some of your activities can be considered to help the community, you are more like a for profit business since you are organized under these laws.

Therefore, based on the information submitted, you are not entitled to exemption under section 501(c)(4) and are a taxable entity. You are required to file federal income tax returns on Form 1120.

If you do not accept our findings regarding your exempt status under section 501(c)(4), we recommend that you request a conference with a member of our Regional Office of Appeals. Your request for a conference should include a written appeal giving the facts, law, and any other information to support your position as explained in the enclosed Publication 892. You will then be contacted to arrange a date for a conference. The conference may be held at the Regional Office or, if you request, at any mutually convenient District Office. If you will be represented by someone who is not one of your principal officers, that person will need to file a power of attorney authorization with us.

If you do not appeal this determination within 30 days from the date of this letter, as explained in the enclosed Publication 892, this letter will become our final determination on this matter.

Sincerely yours,

[REDACTED]

[REDACTED]

District Director

Enclosure: Publication 892