

Internal Revenue Service

Department of the Treasury

District
Director

EPEO Division EP:EO:T
P.O. Box 13163
Baltimore, MD 21203

Person to Contact: [REDACTED]

Telephone Number: [REDACTED]

Refer Reply to: [REDACTED]

Date: MAR 22 1985

▼ [REDACTED]
Certified Mail

Gentlemen:

We have reviewed your application, Form 1024, for exemption from Federal income tax under section 501(c)(4) of the Internal Revenue Code.

Section 501(c)(4) of the Internal Revenue Code provides for the exemption of organizations, operated exclusively for the promotion of social welfare.

Evidence submitted with your application indicated that your primary activity is providing services for your members. Those services are services which would ordinarily be provided by the members themselves as a personal expense for the upkeep of their properties.

Revenue Ruling 74-17, ruled that an organization formed by condominium owners to provide for maintenance and care of common areas of the project and funded by membership assessments does not qualify as a tax exempt organization.

Therefore, it is concluded that you do not qualify for exemption under section 501(c)(4) of the Internal Revenue Code. You may possibly qualify under section 528 of the Code as a homeowners association. If you wish status as a section 528 organization, you must file Form 1120H within the allocated period which is the fifteenth day of the third month following the close of your annual accounting period.

Publication 892 accompanies this letter and describes your appeal rights fully, should you decide to appeal this determination.

Sincerely yours,

[REDACTED]
District Director