

Published Guidance - Social Clubs (IRC 501(c)(7))

Citation and Link	Holding
Rev. Rul. 81-69, 1981-1 C.B. 361	In determining unrelated business income, a social club may not deduct from net investment income losses incurred on sales of food and beverages to nonmembers where such sales have consistently resulted only in losses and will likely continue to result in losses for the club.
Rev. Rul. 80-130, 1980-1 C.B. 117	Social club may pay a reasonable fixed fee to members who bring in new members to the club, without violating inurement proscription in section 501(c)(7).
Rev. Rul. 79-145, 1979-1 C.B. 360	Reciprocal memberships (vs. guests of members) - federal excise tax on wagering.
Rev. Rul. 75-494, 1975-2 C.B. 214	Homeowner association may be exempt if they conduct social or recreational activities; maintaining streets, collecting trash, enforcing covenants, and providing police/fire protection are not social or recreational activities.
Rev. Rul. 74-489, 1974-2 C.B. 169	Social club that sells corporate membership is dealing with the public.
Rev. Rul. 74-425, 1974-2 C.B. 373	Social club is exempt although it conducts wagering activity, limited to members, in connection with its social activities; wagering tax implications also addressed.
Rev. Rul. 74-168, 1974-1 C.B. 139	Corporation-sponsored individual as "member" of social club permitted, where such members have rights and privileges of membership.
Rev. Rul. 74-148, 1974-1 C.B. 138	Awarding cash prizes to tournament winners in bowling league is not inurement.
Rev. Rul. 74-30, 1974-1 C.B. 137	Commingling of members - flying club.
Rev. Rul. 73-520, 1973-2 C.B. 180	Club that promotes a breed of dog may qualify for exemption as a social club.
Rev. Rul. 71-421, 1971-2 C.B. 229	Dog club exempt under section 501(c)(7) but not 501(c)(3).
Rev. Proc. 71-17, 1971-1 C.B. 683	Member business use of club facilities - effect on exemption; recordkeeping requirements.
Rev. Rul. 70-48, 1970-1 C.B. 133	Higher disproportionate payments for services and use of facilities by nonvoting members than voting members is inurement.
Rev. Rul. 70-32, 1970-1 C.B. 132	Commingling of members not found - flying club.
Rev. Rul. 69-68, 1969-1 C.B. 153	Legal or illegal gambling engaged in by members and guests is permitted as traditional business activity.
Rev. Rul. 69-636, 1969-2 C.B. 127	Club's 501(c)(7) exempt status not adversely affected if it makes its facilities available to an exempt organization for charitable fund-raising activities, at charge equal to or less than direct cost.
Rev. Rul. 69-635, 1969-2 C.B. 126	Commingling of members not found - automobile club.
Rev. Rul. 69-573, 1969-2 C.B. 125	College fraternity chapter house exempt under section 501(c)(7), but not 501(c)(3).
Rev. Rul. 69-527, 1969-2 C.B. 125	Providing services to members not part of exempt function of 501(c)(7) organization.
Rev. Rul. 69-281, 1969-1 C.B. 155	Community association, not controlled by developer, may be exempt under section 501(c)(7).
Rev. Rul. 69-232, 1969-1 C.B. 154	Examples illustrating effect of sale of property on exempt status of social club.
Rev. Rul. 69-220, 1969-1 C.B. 154	Club that receives a substantial portion of its income from renting property is not exempt.
Rev. Rul. 69-219, 1969-1 C.B. 153	Club that holds golf course open to general public is not exempt.