

PART 1—INCOME TAXES

(Filed by the Office of the Federal Register on January 13, 2006, 8:45 a.m., and published in the issue of the Federal Register for January 17, 2006, 71 F.R. 2496)

Paragraph 1. The authority citation for 26 CFR Part 1 continues to read, in part, as follows:

Authority: 26 U.S.C. 7805 * * *

Par. 2. Section 1.954-2 is amended by revising paragraphs (a)(5)(ii)(C) and (a)(5)(iii) *Example 2* to read as follows:

§1.954-2 Foreign personal holding company income.

(a) * * *

(5) * * *

(ii) * * *

(C) [The text of the proposed amendment to §1.954-2(a)(5)(ii)(C) is the same as the text for §1.954-2T(a)(5)(ii)(C) published elsewhere in this issue of the Bulletin.]

(iii) * * *

Example 2. [The text of proposed §1.954-2(a)(5)(iii) *Example 2* is the same as the text of §1.954-2T(a)(5)(iii) *Example 2* published elsewhere in this issue of the Bulletin.]

* * * * *

Mark E. Matthews,
*Deputy Commissioner for
Services and Enforcement.*

Deletions From Cumulative List of Organizations Contributions to Which are Deductible Under Section 170 of the Code

Announcement 2006-13

The name of an organization that no longer qualifies as an organization described in section 170(c)(2) of the Internal Revenue Code of 1986 is listed below.

Generally, the Service will not disallow deductions for contributions made to a listed organization on or before the date of announcement in the Internal Revenue Bulletin that an organization no longer qualifies. However, the Service is not precluded from disallowing a deduction for any contributions made after an organization ceases to qualify under section 170(c)(2) if the organization has not timely filed a suit for declaratory judgment under section 7428 and if the contributor (1) had knowledge of the revocation of the ruling or determination letter, (2) was aware that such revocation was imminent, or (3) was

in part responsible for or was aware of the activities or omissions of the organization that brought about this revocation.

If on the other hand a suit for declaratory judgment has been timely filed, contributions from individuals and organizations described in section 170(c)(2) that are otherwise allowable will continue to be deductible. Protection under section 7428(c) would begin on February 13, 2006, and would end on the date the court first determines that the organization is not described in section 170(c)(2) as more particularly set forth in section 7428(c)(1). For individual contributors, the maximum deduction protected is \$1,000, with a husband and wife treated as one contributor. This benefit is not extended to any individual, in whole or in part, for the acts or omissions of the organization that were the basis for revocation.

Flo-Ro Management
Florissant, MO