



Department of the Treasury  
Internal Revenue Service  
Tax Exempt and Government Entities  
P.O. Box 2508  
Cincinnati, OH 45201

Date: 09/13/2023

Employer ID number:

Person to contact:

Name:

ID number:

Telephone:

Fax:

Release Number: 202349015

Release Date: 12/8/2023

UIL: 4942.03-07

#### LEGEND

B = Place

C = Place

D = State

E = Place

F = State

g dollars = Amount

x = Date

Dear \_\_\_\_\_ :

#### Why you are receiving this letter

We received your \_\_\_\_\_ request for approval of a set-aside under Internal Revenue Code (IRC) Section 4942(g)(2). Based on the information furnished, your request is approved.

You are recognized as tax-exempt under IRC Section 501(c)(3) and as a private foundation under IRC Section 509(a).

#### What you need to do

Document your approved set-aside(s) in your records as pledges or obligations. You must pay the set-aside amounts within 60 months after the date of the first set-aside, as required under IRC Section 4942(g)(2).

Take into account the amounts set aside when determining your minimum investment return under IRC Section 4942(e)(1)(A) and the income attributable to your set-asides when computing your adjusted net income under IRC Section 4942(f).

#### Description of set-aside request

You have requested a set-aside of g dollars for the tax year ending on x.

The purpose of the set-aside is to fund construction projects and equipment purchases to further educational programming at your B and C campuses in D and E campus in F. Specific purposes include the construction of new learning centers, upgrades to current buildings and facilities, and the purchase and maintenance of new and existing equipment and vehicles.

You are requesting the set-aside due to pandemic-related supply chain issues and labor shortages that have caused delays in delivery of materials and equipment and slow responses from contractors who are having difficulty finding adequate labor. Accordingly, the set-aside will allow you the time needed to receive your purchases and properly manage your projects; without it, you will be unlikely to finish your projects before the

Keep a copy of this letter for your records.

If you have questions, you can call the contact the person shown above.

Sincerely,

Stephen A. Martin  
Director, Exempt Organizations  
Rulings and Agreements

Enclosures:  
Redacted Letter 4797  
Letter 437