

Release Number: 202443024 Release Date: 10/25/2024 UIL Code: 501.03-00 Date:

05/31/2024

Taxpayer ID number (last 4 digits):

Form:

Tax periods ended:

Person to contact: Name: ID number:

Telephone:

Fax:

Last day to file petition with United States

Tax Court: 08/29/2024

## CERTIFIED MAIL - Return Receipt Requested

Dear

### Why we are sending you this letter

This is a final determination that you don't qualify for exemption from federal income tax under Internal Revenue Code (IRC) Section 501(a) as an organization described in IRC Section 501(c)(3), effective . Your determination letter dated . . . is revoked.

Our adverse determination as to your exempt status was made for the following reasons: You have not demonstrated that you are operated exclusively for charitable, educational, or other exempt purposes within the meaning of IRC Section 501(c)(3).

Organizations that are not exempt under IRC Section 501 generally are required to file federal income tax returns and pay tax, where applicable. For further instructions, forms and information please visit **IRS.gov**.

Because you were a private foundation as of the effective date of the adverse determination, you are considered to be a taxable private foundation until you terminate your private foundation status under IRC Section 507. In addition to your income tax return, you must also continue to file Form 990-PF, Return of Private Foundation or Section 4947(a)(1) Trust Treated as Private Foundation, by the 15th day of the fifth month after the end of your annual accounting period.

#### What you must do if you disagree with this determination

If you want to contest our final determination, you have 90 days from the date this determination letter was mailed to you to file a petition or complaint in one of the three federal courts listed below.

#### How to file your action for declaratory judgment

If you decide to contest this determination, you can file an action for declaratory judgment under the provisions of Section 7428 of the Code in either:

- The United States Tax Court.
- The United States Court of Federal Claims, or
- The United States District Court for the District of Columbia

You must file a petition or complaint in one of these three courts within 90 days from the date we mailed this determination letter to you. You can download a fillable petition or complaint form and get information about filing at each respective court's website listed below or by contacting the Office of the Clerk of the Court at one of the addresses below. Be sure to include a copy of this letter and any attachments and the applicable filing fee with the petition or complaint.

You can eFile your completed U.S. Tax Court petition by following the instructions and user guides available on the Tax Court website at **ustaxcourt.gov/dawson.html**. You will need to register for a DAWSON account to do so. You may also file your petition at the address below:

United States Tax Court 400 Second Street, NW Washington, DC 20217 ustaxcourt.gov

The websites of the U.S. Court of Federal Claims and the U.S. District Court for the District of Columbia contain instructions about how to file your completed complaint electronically. You may also file your complaint at one of the addresses below:

US Court of Federal Claims 717 Madison Place. NW Washington, DC 20439 uscfc.uscourts.gov

US District Court for the District of Columbia 333 Constitution Avenue, NW Washington, DC 20001 dcd.uscourts.gov

Processing of income tax returns and assessments of any taxes due will not be delayed if you file a petition for declaratory judgment under IRC Section 7428.

The IRS office whose phone number appears at the top of the notice can best address and access your tax information and help get you answers. However, you may be eligible for free help from the Taxpayer Advocate Service (TAS) if you can't resolve your tax problem with the IRS or if you believe an IRS procedure just isn't working as it should. TAS is an independent organization within the IRS that helps taxpayers and protects taxpayer rights. Visit **TaxpayerAdvocate.IRS.gov/contact-us** or call 877-777-4778 (TTY/TDD 800-829-4059) to find the location and phone number of your local advocate. Learn more about TAS and your rights under the Taxpayer Bill of Rights at **TaxpayerAdvocate.IRS.gov**. Do not send your Tax Court petition to TAS. Use the Tax Court address provided earlier in the letter. Contacting TAS does not extend the time to file a petition.

#### Where you can find more information

Enclosed are Publication 1, Your Rights as a Taxpayer, and Publication 594, The IRS Collection Process, for more comprehensive information.

Find tax forms or publications by visiting IRS.gov/forms or calling 800-TAX-FORM (800-829-3676). If you have questions, you can call the person shown at the top of this letter.

If you prefer to write, use the address shown at the top of this letter. Include your telephone number, the best time to call, and a copy of this letter.

You may fax your documents to the fax number shown above, using either a fax machine or online fax service. Protect yourself when sending digital data by understanding the fax services privacy and security policies.

Keep the original letter for your records.

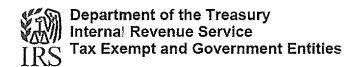
Sincerely,

Lynn A Brinkley

Director, Exempt Organizations Examinations

Enclosures: Publication 1 Publication 594 Publication 892

cc:



Date:

August 29, 2023 Taxpayer D number:

Form:

Tax periods ended:

Person to contact:

Name:

ID number:

Telephone:

Fax:

Address:

Manager's contact information:

Name:

ID number:

Telephone:

Response due date:

September 28, 2023

#### CERTIFIED MAIL - Return Receipt Requested

Dear

# Why you're receiving this letter

We enclosed a copy of our audit report, Form 886-A. Explanation of Items, explaining that we propose to revoke your tax-exempt status as an organization described in Internal Revenue Code (IRC) Section 501(c)(3).

#### If you agree

If you haven't already, please sign the enclosed Form 6018, Consent to Proposed Action, and return it to the contact person shown at the top of this letter. We'll issue a final adverse letter determining that you aren't an organization described in IRC Section 501(c)(3) for the periods above.

After we issue the final adverse determination letter, we'll announce that your organization is no longer eligible to receive tax deductible contributions under IRC Section 170.

#### If you disagree

- 1. Request a meeting or telephone conference with the manager shown at the top of this letter.
- 2. Send any information you want us to consider.
- 3. File a protest with the IRS Appeals Office. If you request a meeting with the manager or send additional information as stated in 1 and 2, above, you'll still be able to file a protest with IRS Appeals Office after the meeting or after we consider the information.

The IRS Appeals Office is independent of the Exempt Organizations division and resolves most disputes informally. If you file a protest, the auditing agent may ask you to sign a consent to extend the period of limitations for assessing tax. This is to allow the IRS Appeals Office enough time to consider your case. For your protest to be valid, it must contain certain specific information, including a statement of the facts, applicable law, and arguments in support of your position. For specific information needed for a valid protest, refer to Publication 892, How to Appeal an IRS Determination on Tax-Exempt Status.

Fast Track Mediation (FTM) referred to in Publication 3498, The Examination Process, generally doesn't apply now that we've issued this letter.

4. Request technical advice from the Office of Associate Chief Counsel (Tax Exempt Government Entities) if you feel the issue hasn't been addressed in published precedent or has been treated inconsistently by the IRS.

If you're considering requesting technical advice, contact the person shown at the top of this letter. If you disagree with the technical advice decision, you will be able to appeal to the IRS Appeals Office, as explained above. A decision made in a technical advice memorandum, however, generally is final and binding on Appeals.

#### If we don't hear from you

If you don't respond to this proposal within 30 calendar days from the date of this letter, we'll issue a final adverse determination letter.

#### Contacting the Taxpayer Advocate Office is a taxpayer right

The Taxpayer Advocate Service (TAS) is an independent organization within the IRS that can help protect your taxpayer rights. TAS can offer you help if your tax problem is causing a hardship, or you've tried but haven't been able to resolve your problem with the IRS. If you qualify for TAS assistance, which is always free, TAS will do everything possible to help you. Visit <a href="https://www.taxpayeradvocate.irs.gov">www.taxpayeradvocate.irs.gov</a> or call 877-777-4778.

#### For additional information

You can get any of the forms and publications mentioned in this letter by visiting our website at www.irs.gov/forms-pubs or by calling 800-TAX-FORM (800-829-3676).

If you have questions, you can contact the person shown at the top of this letter.

Sincerely,

Vanessa Richards Sather Digitally signed by Vanessa Richards Rather Date: 2023.08.28 17.49.51 - 04'00'

For

Lynn A. Brinkley

Director, Exempt Organizations

Examinations

Enclosures:

Form 886-A

Exhibits A-P

Form 6018

Form 4621-A

Publication 892

Publication 3498

Form 86			easury — Irterna Revenue Service tions of Items	Schecule number or exhait
Name of taxp	payer		Tax dentification Number (last 4 digits,	Year/Period ended
ISSUE:				
Whether because it Revenue C		eet the requirements for	tax-exempt status should be exemption under section 501(c)(3)	
FACTS:				
included a		e organizing documents;	(" Form 1023 Application; h storical review of information secured fro	
		Bacl	kground	
<u>Organizatio</u>	onal and Exe	emption History		
the purpose	n in the Stat e in Article tions in Artic	; the authority of	") was incorporated as a n , . The Articles of Incorpo , the	•
The Articles	s included th	ne following purpose:		
The corpora	ation was fo	rmed for the following pu	urposes from Article	
s F o o	ocietal or pu Revenue Cod or value, ( ) a of , or dentified with	ublic purposes which fall de of 1954, as amended, and other as part of the the ;() as a person or persons who of the , , , , or	, or , or a site of a significant ho significantly contributed to the or the ; ) an of the of an	interest of the State ; ( ) as of the

Form <b>886-A</b> (May 2017)			Department of the Treasury – Internal Revenue Service  Explanations of Items					Scheoule rumber or exhit
Name of ta	axpayer	•			Tax Identific	ation Number <i>(la</i>	st 4 digits)	Year/Perioc ended
		has i	nfluenced the		of or	; and ( ) :		ot a significant
b)	purcl or co secti recei	hase, orpora on fro ive an	lease or other ion, for any an m its members	wise, either a ad all of the o a, from the pu h funds and	bsolutely or rganizations blic and fro property an	n as to amou · jointly with a s described in m all other so	int or valuany other number of subsections of the s	•
c)	To furth	, eranc	, or otherwi e of these purp	ise deal with oses;	all	, and	, to	be used in
d)	To with	gover	with other org nmental agenc		•			lividuals, and
e)	purpo	oses v	se operate exc vithin the mear n the course of	ning of 501(c)	(3) of the Ir			societal, or public of 1954, as
	i.	distr corp for s	ibutable to, its oration shall b	members, di e authorized red and to ma	rectors, offi and empov	cers, or othe vered to pay	r persons reasonab	enefit of, or be , except that the le compensation furtherance of
	ii.	prop shal state	aganda, or oth	nerwise attem e in, or interv olitical campa	npting to infl ene m (inclu ign on beha	luence legisla uding the pub alf of any can	ation, and sishing o ididate fo	e carrying on of I the corporation r distribution of r public office
	iii.	carry exer 1954 Rev	or any other	activities not al income tax sponding pro- b) by a corpo the Internal F	permitted to cunder 501 vision of an pration, conf Revenue Co	o be carried ( (c)(3) of the I y future Unite tributions to v ode of 1954 (	on (a) by internal R ed States which are or the coi	evenue code of Internal deductible

Form <b>886-A</b> (May 2017)		ons of Items	Scheoule number or exhibit			
Name of taxpayer	Name of taxpayer  Tax Identification Number (last 4 digits)					
The powers vested i	n , the	's initial member from Article	:			
a) "Appoint a	Il the directors of the corpora	ation;				
•	to the corporation's board of n's president;	directors all candicates for sele	ction æs the			
	xpressly all amendments to t e they become effective;	the corporation's articles of inco	poration and by-			
d) Approve the classes of		embers and the establishment c	fadditiona			
e) Approve th (\$	ne incurrence of debt by the o	corporation in excess of				
f) Approve th	ne annual budget of the corp	oration				
g) Approve o	perating policies established	by the corporation; and				
h) Approve tr	ansfers of the corporation's a	assets, in excess of \$ to tra	ansferees.'			
A statement that the	Foundation would make qua	alifying distributions was included	lin :			
will make qual Code of 1954, the application as distribution Code of 1954, contributions.	exable year in which the cor lifying distributions, as define as amended, without regard n of Section 4942(g)(3) of the s out of corpus (in accordand as amended, in an amount	e ( rd) month after the close poration receives contributions, ed in Section 4942(g) of the Interd to paragraph ( ) thereof which a Internal Revenue Code of 1954 ce with Section 4942(h) of the Internal to one hundred percent (1 hin adequate records or other suffere appropriately made "	the corporation nal Revenue are treated after I, as amended, ternal Revenue 30%) of such			
Form 1023 Application	<u>ın</u>					
		IRS") received Form 1023- Appl 3) of the Internal Revenue Code				

Form <b>886-A</b> (May 2017)	·	Department of the Treasury — Internal Revenue Service  Explanations of Items					Schedule number or exhibit	
Name of taxpayer	1			Tax Ident fic	eation Nu	mper (last 4 digits)	Year/Peri	od ended
1984). The app	lication was	signed by the					on	1
According to Pa wou description of th provide ,	ıld be	and by the activities was to and	"to ' ." The		there v	vould be no ). The from the and made a contri then contr		and to , stained-
Per , that the	Sta was a	atement as to			, line	esw xoc ent	checked	66 33
Exemption Lette	<u>ər</u>							
The application was an	within the	an exemption le e meaning of Se , . In the as defined in Se	ction 50 e letter,	)9⊧a) of t the IRS	determ	le as of the dat ined that the	exemptions te the For	
The as a s code from	tated the	_	, ted an e cognize	extensior ed as exe	n to the empt u	he letter was a month fiiing nder section 50		
		Historie	cal For	ms				
Forms f	was not filed	filed for the pre d for the tax year , to nce sheet was p	rs ende ,	d were ir	, ispecte	, and ed. A spreadsh	,	h <del>e</del>

Catalog Number 20810W

Form <b>886-A</b>	Department of the Treas	ury – nternal Revenue Service	Scheaule number
(May 2017)			
Name of taxpayer		Tax Identification Number (last 4 digits)	Year.'Perioc ended
INCOME	NA AMERICA		
Sources of Funds			
From the fiscal years net gain loss from so of . All the for each year)	urces it reported as	; and ; and	ed income and d net loss from hibit for detail
Contributions- cash The repo made a \$ .	•	n income on their Forms ars and a return was filed for a to	tal of
Contributions- non-ca A total of \$ year ended , valued at and was a , the	in non-cash contributions vas donated to was determined to the contributions vas determined to the contributions vas determined to the contributions value of the contribution of the c	valued at \$ . The internet wa	and a
Dividends and interest Dividend and interest and . The			scal years ended held at
, the identified the item sol . T \$ . During the	) were reported on t reported a of d was a t he loss was computed using	the . During the fis \$( ). Part of the Form hat was purchased on the sales price of \$ les the reported a loss of	n and sold on s the cost of
EXPENSES			
From the fiscal years ; year)		, the repor contributions. (see Exhibit for d	-

Catalog Number 20810W

	Department of the Treas	Department of the Treasury – merna Revenue Service				
Form <b>886-A</b> (May 2017)	·	Explanations of Items				
Name of taxpayer	Tax Identification Number (last 4 digits)	Year/Period ended				
\$ in fe	es; \$ in fe ntributions were made by the		s. Part ,			
<ul> <li>contribution</li> <li>contribution</li> <li>contribution</li> <li>contribution</li> <li>contribution</li> </ul>	nibit ): s to s to to s to	for a total of \$  for \$  for a total of \$	ii uie			
<ul><li>contribution</li><li>contribution</li></ul> BALANCE SHEET		for a total of \$ fcr \$				
From the fiscal years	<del>_</del>	, the report trustees etc, and other assets. (s	ed assets that see Exhibit for			
Receivables from off During the fiscal yea trustees on the Form		reported recervables from off	icers. directors,			
	nk records submitted during to of the on Bank records also showe	reported an asset of \$ the examination revealed that the , to d a seposit of \$ into the orkpaper submitted during the ex	in the			
described the payme The Form ins	ent as receipt of structions for Line -receivab sons loans requests addition	les due from officers, directors, to nal information in an attached sch	ustees, and			
1. 2. 3.	,					

Form <b>886-A</b> (May 2017)			epartment of the Treasury – Internal Revenue Service  Explanations of Items				
Name of taxpayer			Tax dentification	Tax dentification Number (last 4 digits,			
4. , 5. , 6. , 8. 9. 10. Description and				-			
A schedule that included with Forms	luded the abo filed for	ove information and	about	with v	was not submitted		
Other assets The other assets co	onsisted of ;	;		;	; and		
The was valued on the f		peen reported o	n the Form on al Forms	since filed.	. The		
The and have been valu	ed at \$	and and \$		vere donated du ely on the subse	<b>-</b>		
The loss the subsequen	•	hased during thended	e fisc≊l year en	dec	and sold at a		
valued at \$ wrote check # year ended \$ was w was	on report ritten off as a conducted ar was conduct y dissolved	ords submitted to to the amount of the amount of the loss during the the noting and it was deed, and it was	during the exan for as an year ended n cou d be foun letermined that	. The entire inv . A g d. An	vorkpapers for the vestment of oogle search for was a domestic		

For more information on Bank Refund Due see above section- Receivables from officers, directors trustees etc.

Form <b>886-A</b> (May 2017)						Schecule number or exhibit
Name of taxpayer		<u>.</u>			lumber 'last 4 digits	Year/Period ended
The subsequent year t	were donate the value drop	<b>—</b>	<u>.</u>	and valu	ec at \$	. The
No Liabilities were	e reported on t	he Forms				
	F	orms	under l	Examinati	ion	
An examination of fiscal years ended nformation was se		filed by ; review of the	anc	ns	was initiat	for th ed. The following
n response to Par was included on th		about the	•	purpo		llowing statement
	purpos for the balance is bei and to pay the	and ng held for fo	uture expense	and of s."	the . T	he of the
NCOME						
Sources of Funds						
The re ncome was There was no inco ended	eported a total dona ome for the fisc	ted	а	nd \$	al year ended in interest. d nc income fo	. Th or the fiscal year
	11	1 1	1		JA <sup>-</sup> CT	
Contributions-cash		,	-	<u></u>		
Contributions- Noncash						
	1			i i	Į.	
Interest	1 •		-	-	, ·	

www.irs.gov

Fcrm <b>886-A</b> (May 2017)	'	epartment of the Treasury – Internal Revenue Service  Explanations of Items			
Name of taxpayer		Tax :dentification Number flast 4 digits,	Year/Period ended		
EXPENSES					
Use of Funds					
The reporte expenses for the fiscal y		penses for the fiscal year ended and \$ in expenses for the	; r e fisca⊹year		
ended . T	ne expenses were \$	in ;\$ in	fees and \$		

in made in any of the years.

	1 1	1 1	1 1	TOTAL
EXPENSES				
Accounting fees		-		
Other expenses				
State fees		-		
Bank fees				
Contributions		-		
TOTAL			,,, , , , , , , , , , , , , , , , , ,	

# **BALANCE SHEET**

fees. There were

ine ,		, other notes receivable and other assets. The other assets consisted of						
and	´; . No	were reported or			;			
Receivables	from officers,	directors trustees etc.						
During the fis	scal year	, the	reported recen	vables from offic	ers. directors,			
trustees on th	•	in the amount of \$	•					
loan that incl		ons for Line -receivable oans requests additiona wing:						
1.		1						
2.	1							

_ OOC A		Department of the	Treasury – त्रोerna	Revenue Service		Schedu e number	
Form <b>886-A</b> (May 2017)			Department of the Treasury – Internal Revenue Service  Explanations of Items				
Name of taxpayer	·			ification Number (last 4	digits,	Year/Period ended	
				•			
3. ,							
4. ,							
5. ,							
6. 7	•						
7. ,							
8.							
9.	, and						
10. Description and		of the o	consideration	furnished by the			
A schedule that inclu with Forms fi	ded the al led for	oove informati ,	on about rec	eivables with offic and	cers was	s not submitted	
Other notes and loan During the fiscal year the amount of \$		ole , the	repo	orted other notes	and loar	ns receivable in	
Other assets The other assets of are reported	on all	; years at the	e same value	in the historical l	; Forms	;	
In addition to the		that were do	nated during	; a	ın additi	onal conation of	
were o	donated di		_	alue of the coins			
, to \$	i	•	to \$	in	•	•	
The balance sheet fo	r the	repo	orted fixtures	valued ar \$	•		
		1 1	11	1			
ASSETS							
Cook non interest							
Cash non-interest							
Receivables from office directors, trustees	ers,						
Other notes and loans receivable		-					
Other assets							
		MH2mmmmm					

Form <b>886-A</b> (May 2017)	<b>Д</b>	Scheaule number or exhibit			
Name of taxpayer		į	Tax Identification Num	ber Cast 4 digits)	Year/Perioc ended
				\$	
TOTAL					

A further review revealed that significant sections of the returns were either incomplete, had or was . This included:

- Part V Qualification under Section 4940(e) for Reduced Tax on Net Investment Income.
   Column (c) and (d) had
- Part VI Excise Tax Based on Investment Income. Fields hac
   Part IX-A Summary of Direct Charitable Activities section contained
   Part IX-B Summary of Program Related Investments contained
- Part X Minimum Investment Return section- Cash deemed head for charitable use assets was the fair market value of total assets. Minimum investment return was .
- Part XI Distributable Amount section was
- · Part XII Qualifying Distributions section. Fields had
- Part XIII Undistributed Income section was
- Part XIV Private Operating Foundations section. The box for private operating foundation under section 4942(j)(3) was . The adjusted net income was for the current and prior years. The % of the adjusted net income was for the current and prior years. The value of assets and the value of assets qualifying under section 4942(j)(3)(B)(i) was .
- Part XV Supplementary Information Grants and Contributions Paid during the Year or Approved for Future Payment. This section contained;
- Part XVI-A Analysis of Income Producing Activities section included interest income of
   in and was for and ; and
- Part XVI-B Relationsh p of Activities to the Accomplishment of Exempt Purpose section stated interest was used to pay expenses of foundation for ; was for and .

	Form 886-A (May 2017)  Department of the Treasury – Internal Revenue Service  Explanations of Items					er
Name of tax				ligits, YeariPeriod end	led	
Training of tary				Tax dentification Number (last 4 d		
			Forms	Filed		
A Form ended reported	was su		d by the eceived by the Interna with	al Revenue Service on	for the fiscal year . The retu	
ACT NO.	DATE OF	ACT	DES	CRIPTION	AMOUNT INVOLVE	D
1		1 ,				
2		1				
3 4		1				
5	1	1				
6		1				
			TOTAL			
The followi	ng statem	ent reg	arding the transactior	ns was included on the Forr	n :	
for a busing to repay the the return v	ess activity e amount was filed th	y opera ne	ited by the , including ,	during the tax year. listed in Schedule The f . It is the as soon as the funds are a t have the funds availab e t	ungs were borrowe intentio wailable. At the tim	ed on
Correspond	dence and	reenor	<b>Exami</b> nses to IDR's	nation		
Conespond	ucilice alla	1CSDOI	1969 10 101/ 9			
, a Request No requested :	ınd o 01 ("IDR such inforr	-01") a nation	was initiated when And Publication 1 that	for the fiscal years ended Appcintment Letter 3611, In was mailed out on tents, an interview; tour of r	. IDR-C1	

Form <b>886-A</b>	·	Department of the Treasury – Indernal Revenue Service  Explanations of Items			
(May 2017) Name of taxpayer	Ехріа	Tax Identification Number (last 4 di	igits; Year/Period ended		
art VII-A the books nailbox was full and	are in care cannot accept messag		number from Part B-		
by the status of th	. The res	ey of Letter 3611, IDR-0↑, and Pub ponse due date was ecked on the and a notice was left	. On ,		
nclaimed by		returned to sender. The	was		
	nation for the of Attorney was subm		in order to On , of the initial audit Letter 3597 to		
n , th pages:	e following documents	were received by fax from	, with		
to the request A copy of Lett	with to if they exist, are in to for minutes was none. er 3611 and IDR-01 da	·	ached. The response		
<ul><li>Ban</li><li>Ban</li><li>workpap</li><li>;</li></ul>	k -month CD accoun	<u> </u>	ugh		
<ul><li>Invoice from preparation of</li></ul>	oncash Charitable Cont of & ,	- FMV- \$ ca਼ਾed - ation tax return in the amount of \$	or for the for \$ for the		
preparation of	the Forms ,	ard Ann	nual Report for the		

Form <b>886</b> (May 201				ury — Imernal Revi Ons of Ito		_	Scheaule number or exhibit
Name of taxpayer				Tax dentificat	ion Number (last 4 o	ligits <sub>)</sub>	Year/Period ended
• Email	in th			g and prepa 	aration of Forms		for ted
denon		vas thanked for the w th a value of \$	of to tl	he			(\$ face value Signed by
·		01 was reviewed and			·		
during the fis	cal year accounts	submitted were reviev to s. An invoice was sub tion of the returr	mitted	.There wa I from	is a total of \$ & for t	he pa	transferred ayment of
Date		Transaction			Amount		
11	A					-	
11	*******				( )		
1 1					<i>(</i> )		
1 !					( )		
					( )	-	
11	•				( )	7	
					and the second s		
	TOTAL			-	( )	]	
The bank sta through	tements	were reviewed and the	ere wa	as no financ	ial activity noted	d aur	ing
during the fis- out the bank	cal year accounts services	submitted were review to s. An invoice was subn s provided. No docum ut the workpap . A ; and for check #	nitted nentationers for	. There wa from & on was subi r the fiscal y	as a total of \$ & for the mitted for the tra	ie pay ansfe	transferred yment of er to , identified

Form <b>886-A</b>	Form 886-A Department of the Treasury - Incernal			Schedule number or exhibit
(May 2017)	Explanati	ions of I	tems	
Name of taxpayer		Tax Identifica	Year/Period ended	
	. The state records als stered agent. The bank statement	o identified	owed a wire transfer	s the ' into the checking
Date	Transaction		Amount	
11			(	
//	<del></del>			
1 1			( )	
1 1			( )	
11			()	
11			( )	
11				
11	110000000000000000000000000000000000000		( )	
ТОТ	AL.			
Livinia				
was ou the a	a was held with t of town and the difficulties with mount was not reported on the arched the issue and found sor was informed that follow- by.	Form ne exclusior	. stated t n to maкing	sed the fact that that if you had no
Requests 02-Follo	he incomplete response to IDRow up to IDR-01 and 02 see Exhibit ). The response di pwing:	Amou	int were faxed to	nation Document
	n Document Request 02- Follow d Section B- additional docume			

Catalog Number 20810W Page 15 www.irs.gov Form **886-A** (Rev. 5-2017)

Form <b>886-A</b> (May 2017)		y - Incernal Revenue Service Ons of Items	Scheaule number or exhibit	
Name of taxpayer		Tax Identification Number (last 4 digits,	Year/Period ended	
an statements an fiscal years en . Sec	ded ,	raisals and other valuations of t , at was relied upon in the detern	and	
On ,	faxes were received from	,		
<ul><li>A fax cover sh</li><li>A letter from</li><li>Only</li></ul>	<del>-</del>	in response to IDR-02- Follow om IRS to	up to !DR-01:	
• workpape	ers for computation of Line 10 Return. 3597, Letter 5464, IDR-02 a	c- of all other	assets from Part	
A second fax of pag	ges with the following docume	ents in response to IDR-02- Fol	llow-up to IDR-	

- A fax cover sheet dated
- Facsimile cover sheet dated
- Copy of the front and back of Check # to Copy of the front and back of Check # to

The response to 02-Follow up to IDR-01 and 02 Distributable Amount was reviewed and determined to be incomplete.

The following subsequent correspondence was between the IRS, and the

Date Mailed	Correspondence	Mailed to:	Due date
1 1	Letter 5464, IDR -02 and IDR -03(corrected number)		N/A
1 1	Letter 3597, Letter 5464, IDR -02 and IDR - 03(corrected number)		N/A

Form **886-A** (Rev. 5-2017) Catalog Number 20810W Page \_\_16\_ www.irs.gov

Form <b>886</b> - (May 2017		Department of the Tre	=	_	2	Schedule number or exhibit
Name of taxpaye	r		Tax Ider	ntification Numbe	r (last 4 digits)	Year/Period ender
	Income	8603 Corsent Request, Form 8 and Excise tax IRC 4940 (3 co	pies),			
1 1	4945 (3	72 for Excise taxes IRC 4942, 4 ccpies) and Publication 1035 on of the statute of limitations.			/ /	
1 1	Form 8 (3 copie 4944 ar	1597, Letter 3600 Consent Req 72 For Income and Excise tax I res), Form 872 for Excise taxes and 4945 (3 copies) and Publica rest extension of the statute of I	RC 4940 IRC 4942, tion 1035		1 1	
//	(update IRC 494 revision 4945 (3	600 Consent Request, Form 8 of revision) For Income and Except (40 (3 copies), Form 872 (update) for Excise taxes IRC 4942, 49 ocopies) and Publication 1035 for of the statute of limitations.	cise tax ed 944 and		1 1	
//	Form 8 Excise (update 4944 ar	597, Letter 3600 Consent Requ 72 (updated revision) For Incontax IRC 4940 (3 copies), Form direvision) for Excise taxes IRC and 4945 (3 copies) and Publicatest extension of the statute of li	ne and 872 3 4942 ion 1035			
11	Letter 3 1035	599 Consent Follow up, Public	ation		1 1	
11	Letter 3 1035	599 Consent Follow up, Public	ation		1 1	
1 1		Forms 872; workpapers o , journal entries, and cash anal and				
11		077-D IDR Delinquency Notice R-C3 Certified Mail	, IDR-C2		1 1	
11		597, Letter 5077-D IDR Delinqı IDR-02 and IDR-03 Certified I			1 1	
//		077-A Pre-Summons Notice and C-03-Certified Mail.	d IDR-02		1 1	

Catalog Number 20810W Page 17 www.irs.gov Form **886-A** (Rev. 5-2017)

Letter 3597, Letter 5077-A Pre-Summons Notice and IDR-02 and IDR-03-Certified Mail.

Fcrm <b>886-A</b> (May 2017)	Department of the T	Treasury – Hatern ations o		Schedule number or exhibit	
Name of taxpayer		Tax∃der	Year/Period ended		
	Letter 3598 Transmittal of Signed co Signed Form 872 For Income and E: IRC 4940, Signed Form 872 for Exci IRC 4942, 4944 and 4945	xcise tax			
	Letter 3597, Letter 3598 Transmittal consent, Signed Form 872 For Incor Excise tax IRC 4940, Signed Form 8 Excise taxes IRC 4942, 4944 and 49	ne and 372 for			
1 1	workpapers of trial balance, jou and cash analysis for ,	irna entries, , and			
1-1	Letter 3164- Third Party Contact	······································			
	Letter 3597 and Letter 3164- Third P Contact	arty			
	Bank statements for ,	and			

As of the last information submitted, the response to DR-02 and IDR-03 was still incomplete and did not submit to an interview about the activities of

#### **Activities**

activities and there was no record a website The internet was searched for referred to or any mention of activities conducted by . The purpose or the Form was researched. The is the in designed by in (see Exhibit ). According to the property tax information for was the owner of the . (see Exhibit ) The was researched on the website and under accessibility was identified as see Exhibit i). The website included a list of , and the was not included on the list (see Exhibit ).

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Form <b>886-A</b>		e Treasury – Internal Revenue Service	Schebule number or exhibit
(May 2017)	Expiai	nations of Items	
Name of taxpayer		Tax Identification Number <i>(last 4 digit</i>	s, Year/Period ended
	exempt statusesed the proposed revo	report was issued was issued that s under IRC 501(c)(3). No written pocation.  nd additional Information Documer	position was
	after initial examination	ı report	
Information Docume	st documentation of the nt Request No 5 ("IDR-0 Balance Sheet assets	nt Request No 4 ("IDR-ጋ4")- Activit activities and operations of 05")- Balance Sheet was issued to of and a purchased b	Also, request
On , the 04:	e following documents o	dated - were received in	response to IDR-
Newspaper/Be .	ook articles and	of the	
Handwritten p	roposal pages for		
Partial brochu	re for		
<ul> <li>Handwritten</li> </ul>		mission statement and statemer	π of purpose
Bylaws of			
<ul><li>Correspondent</li><li>; and</li></ul>	ce- requests to view in books.	; thank you letters; request	s to the
Also received on	, were doc	uments in response to DR-05 wer	e:
• loan agree	ements that outlined the for loans that totaled \$	terms of the agreements between  The documents	and submitted indicated

Catalog Number 20810W Page 19 www.irs.gov Form **886-A** (Rev. 5-2017)

Form <b>886-A</b> (May 2017)	Department of the Treasury – Internal Revenue Service  Explanations of Items	Scheoule number or exhibit	
Name of taxpayer	Tax Identification Number (last 4 digits)	Yeari€erioc ended	
	ļ		

that the purpose of the to were for " signed the agreements as both the and

DATE	1,,	11	, ,	1.1	1.1	. ,
DATE	<u> </u>	11	1 1	1 1	1 1	1 /
BORROWER				Ē		
AMOUNT						
DELIVERY METHOD						
	months maximum; % interest	% interest, Balloon payment	% per annum, Balloon payment	% yr interest, Balloon payment	% int yearly, Balloon payment or Principa: + interest	% interest yearly Ealloon payment of both Principal and Interest
PAYOFF DATE	by , or earlier	month maximum	No later than	No later than	-year note, no prepayment penalty	up to years,
731011 2716	Funding negative cash from	Funding negative cash from	Funding negative cash from	Funding negative cash from	Funding negative cash from	Negative cash flow from projects-
					and	, and
						,
PURPOSE						

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Form <b>886-</b> / (May 2017)	- · · · · · · · · · · · · · · · · · · ·					Scheaule number or exhait	
Name of taxpayer			;	Tax∷den ,	tification Number (	last 4 digits)	Year/Period ended
	;	, , , , , , , , , , , , , , , , , , ,	, ,		, ,	,	;
SIGNATURE OF BORROWER							
SIGNATURE FOR	President ,	President	Presid	ent ent	President	President.	President ,
INTEREST PAYMENTS PAYOFF DATE	-	-	-		- / /	- None	- None
PAYOFF AMOUNT	1	1				None	None
One the purp		nat outlined that totaled to	\$,	. Th	agreement be le docum I a move to		ted indicated that
DATE			' 1		- And and and		
BORROWER	₹		***	or	-		
AMOUNT	44.00						

**DELIVERY METHOD** 

Wire to Property Owner-

Form <b>886-A</b> (May 2017)	sice Schearle number or exhibit	
Name of taxpayer	Tax identification Num	per <i>!ast 4 digits;</i> Year/Period ended

TERMS	% per annum, until receives payment of approx \$ , which has been awarded. Interest yearly.		
PAYOFF DATE	year note- extension possible; / / Nc prepayment penality		
PURPOSE	wishes to move to , as soon as guaranteed full is paid in full.		
COLLATERAL	None		
SIGNATURE OF BORROWER			
SIGNATURE FOR LENDER	, President		
INTEREST PAYMENTS	Interest payments- , - , - , - , - , - , - , - , - , - ,		
PAYOFF DATE	None		
PAYOFF AMOUNT	None		

•	Documentation of Check # and Check # to	to	for \$	; ,	for dated	\$,	dated , .	,
	documents for the purch	ase of	the fix	ture	signed by		:	
	The , , documer	nt state	d the	follov	ving:			
	"To record the payment Of:		,	to			for the purcha	ise
	Purchased on Behalf o Individually.	f the				i	by .	

Ferm <b>886-A</b> (May 2017)	£	reasury - Internal Revenue Service ations of Items	Scheaule number or exhibit
Name of taxpayer		Tax Identification Number (last 4 digits,	Year/Period ended
	ent of \$ , . to ce of \$ to be pai to be securely stored in t	•	's date.
The	, document stated	the following:	
"On th	is date, we make a final P to	ayment for of	
This fi	nal Payment is \$ , .	, payable from	Check# ."
<ul> <li>Additional do from the the from</li> </ul>			descri <b>pt</b> ion f <b>r</b> om , , on
follow up was issued years under examin Request No 7 ("IDR regarding questions	d to request documentation ation from , , to -07")- Balance Sheet follow	uest Nc 6 ("IDR-06")- Activities and n of activities conducted by , . Also Information E w up was issued to request addition that it is necessary.	during the Document nal information
On , th  for Emails regard	- C	ere received in response to IDR-06	(see Exhibit ):
Also received on		owing statements that provided cla with and	rificatio∩ on the ∙see
			intended to be The assets cy of assets to

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F	crm <b>886-A</b> (May 2017)	,	reasury – Indernal Revenue Service ations of Items	Schedule number or exhibit
Name	of taxpayer		Tax Identification Number (last 4 di	gits; Year/Period ended
	condition o	The intent was to show the f was not imp	<u> </u>	. The financial nas been ."
• In add	" No provided of dition, in resp	al condition of documentation of the any actions taken when the conse to IDR-07 the following	was provided. No do	has been ocumentation was and
on	made by			
•	On that reporte by	•	and deposit. No documentation	checking account
	manageme paid in made to	nt has determined the outsta	anding is \$	he will be and
•	On by		re submitted that showed the payment for made i	payment n to
•	the on	submitted a bank state made by to	ment on , , that checking accoun	t showed a deposit of t by

Date	Description	Amount	Principal	Interest	Purpose of payment
11	. 10. 1017				y
1 1	Deposit	, .		, .	
11	Deposit	, .		, .	*****
	Deposit				Ann and a
1 1		, .	1		- Laurent Avenuer
1 1		,	, .		

	Form 886-A (May 2017)  Department of the Treasury – Internal Revenue Service  Explanations of Items			9	Schedule number or exhibit		
Name of taxp	payer			Tax Identi	fication Numbe	er (last 4 digits)	Year/Period ended
1 1	Deposit T	ransfer from		•	•		
1 1	Deposit			•		, .	
1 1				ı ·		1 .	
	TOTAL			<u>, , , , , , , , , , , , , , , , , , , </u>	, ,	, .	
On k According to of the also was as shown to the	style. sked to sh	, an who a it was one of the gre such as the such as a	bo repli	ed oth the	in the	. A / from .	Agent and the was conducted and ollowing was
•		-		ł	by	;	anc
		of				were sto	ored against the
•		- was a	ir	the			
•		- located under the	he				
•	- si	ored in		at the	e bank		
• the	- The			s	tored in be	x with	in

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Form <b>886-A</b> (May 2017)	ury – Internal Revenue Service Ons of Items	Scheaule number or exhibit	
Name of taxpayer		Tax Identification Number (last 4 digits,	Year/Period ended

#### LAW:

Internal Revenue Code section 501(c)(3) exempts from federal income tax corporations, and any community chest, fund, or foundation, organized and operated exclusively for religious, charitable, scientific, testing for public safety, literary, or educational purposes, or to foster national or international amateur sports competition (but only if no part of its activities involve the provision of athletic facilities or equipment), or for the prevention of cruelty to children or animals, no part of the net earnings of which inures to the benefit of any private shareholder or individual, no substantial part of the activities of which is carrying on propaganda, or otherwise attempting to influence legislation (except as otherwise provided in subsection (h)), and which does not participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of (or in opposition to) any candicate for public office.

Internal Revenue Code section 6001 Every person liable for any tax imposed by this title, or for the collection thereof, shall keep such records, render such statements, make such returns, and comply with such rules and regulations as the Secretary may from time to time prescribe. Whenever in the judgment of the Secretary it is necessary, he may require any person, by notice served upon such person or by regulations, to make such returns, render such statements, or keep such records, as the Secretary deems sufficient to show whether or not such person is liable for tax under this title.

Internal Revenue Code section 6033 (a)(1) Organizations required to file- In general. Except as provided in paragraph (3), every organization exempt from taxation under section 50° (a) shall file an annual return, stating specifically the items of gross income, receipts, and disbursements, and such other information for the purpose of carrying out the internal revenue laws as the Secretary may by forms or regulations prescribe, and shall keep such records, render under eath such statements, make such other returns, and comply with such rules and regulations as the Secretary may from time to time prescribe.

Treasury Regulations section 1.501(c)(3)-1(a)(1) Organizational and operational tests. In order to be exempt as an organization described in section 501(c)(3) an organization must be both organized and operated exclusively for one or more of the purposes specified in such section. If an organization fails to meet either the organizational test or the operational test, it is not exempt.

Treasury Regulations section 1.501(c)(3)- 1(b)(1)(i) Organizational test—In general. An organization is organized exclusively for one or more exempt purposes only if its articles of organization (referred to in this section as its articles) as defined in subparagraph (2) of this paragraph:

(a) Limit the purposes of such organization to one or more exempt purposes; and

Form <b>886-A</b> (May 2017)	Department of the Treasury – Imernal Revenue Service  Explanations of Items	Scheaule number or exhibit
Name of taxpayer	Tax dentification Number (last 4 digits!	Year/Period ended

(b) Do not expressly empower the organization to engage, otherwise than as an insubstantial part of its activities, in activities which in themselves are not in furtherance of one or more exempt purposes.

Treasury Regulations section 1.501(c)(3)-1(b)(1)(iii) Ar organization is not organized exclusively for one or more exempt purposes if its articles expressly empower it to carry on, otherwise than as an insubstantial part of its activities, activities which are not in furtherance of one or more exempt purposes, even though such organization is, by the terms of such articles, created for a purpose that is no broader than the purposes specified in section 501(c)(3). Thus, an organization that is empowered by its articles to engage in a manufacturing business, or to engage in the operation of a social club does not meet the organizational test regardless of the fact that its articles may state that such organization is created for charitable purposes within the meaning of section 501(c)(3) of the Code.

Treasury Regulations section 1.501(c)(3)- 1(b)(4) Distribution of assets on dissolution. An organization is not organized exclusively for one or more exempt purposes unless its assets are dedicated to an exempt purpose. An organization's assets will be considered dedicated to an exempt purpose, for example, if, upon dissolution, such assets would, by reason of a provision in the organization's articles or by operation of law, be distributed for one or more exempt purposes, or to the Federal Government, or to a State or local government, for a public purpose, or would be distributed by a court to another organization to be used in such manner as in the judgment of the court will best accomplish the general purposes for which the dissolved organization was organized. However, an organization does not meet the organizational test if its articles or the law of the State in which it was created provide that its assets would, upon dissolution, be distributed to its members or shareholders.

Treasury Regulations section 1.501(c)(3)-1(c)(1) Operational test—Primary activities. An organization will be regarded as operated exclusively for one or more exempt purposes only if it engages primarily in activities which accomplish one or more of such exempt purposes specified in section 501(c)(3). An organization will not be so regarded if more than an insubstantial part of its activities is not in furtherance of an exempt purpose.

Treasury Regulations section 1.501(c)(3)-1(d)(1)(i) Exempt purposes- in general. An organization may be exempt as an organization described in section 501(c)(3) if it is organized and operated exclusively for one or more of the following purposes:

- (a) Religious,
- (b) Charitable,
- (c) Scientific,
- (d) Testing for public safety,
- (e) Literary,

Form <b>886-A</b> (May 2017)	Evalous dispassing a filteres			
Name of taxpayer	Tax dentification Number (last 4 digits)	Year/Period ended		

- (f) Educational, or
- (g) Prevention of cruelty to children or animals.

Treasury Regulations section 1.501(c)(3)-1(d)(1)(ii) An organization is not organized or operated exclusively for one or more of the purposes specified in subdivision (i) of this subparagraph unless it serves a public rather than a private interest. Thus, to meet the requirement of this subdivision, it is necessary for an organization to establish that it is not organized or operated for the benefit of private interests such as designated individuals, the creator or his family, shareholders of the organization, or persons controlled, directly or indirectly, by such private interests.

Private foundations are generally divided into two types: private operating foundations (as defined in Internal Revenue Code section 4942(j)(3)) and private non-operating foundations. Among other things, Internal Revenue Code sections 4942(a)(1) and 4942(b) provide that operating foundations are not subject to the initial and additional taxes under internal Revenue Code section 4942 for failure to distribute income.

Treasury Regulations sections 53.4942(b)(1) and (2) provide that, in order to qualify as an operating foundation, a private foundation must satisfy an income test and one of the following tests: the assets test, the endowment test, or the support test.

Treasury Regulations section 1.6001-1(a) In genera. Except as provided in paragraph (b) of this section, any person subject to tax under Subtitle A of the Code (including a qualified State individual income tax which is treated pursuant to section 6361(a) as if it were imposed by chapter 1 of Subtitle A), or any person required to file a return of information with respect to income, shall keep such permanent books of account or records, including inventories, as are sufficient to establish the amount of gross income, deductions, credits, or other matters required to be shown by such person in any return of such tax or information.

Treasury Regulations section 1.6001-1(c) Exempt organizations. In addition to such permanent books and records as are required by paragraph (a) of this section with respect to the tax imposed by section 511 on unrelated business income of certain exempt organizations, every organization exempt from tax under section 501(a) shall keep such permanent books of account or records, including inventories, as are sufficient to snow specifically the items of gross income, receipts and disbursements. Such organizations shall also keep such books and records as are required to substantiate the information required by section 6033.

Treasury Regulations section 1.6001-1(e) Retention of records. The books or records required by this section shall be kept at all times available for inspection by authorized internal revenue officers or employees, and shall be retained so long as the contents thereof may become material in the administration of any internal revenue law.

Fcrm <b>886-A</b> (May 2017)	Department of the Treasury — Internal Revenue Service  Explanations of Items	Scheaule number or exhibit
Name of taxpayer	Tax Identification Number (last 4 digi	its; Year/Period ended

Treasury Regulations section 1.6033-2(i)(2) Every organization which is exempt from tax, whether or not it is required to file an annual information return, shall submit such additional information as may be required by the Internal Revenue Service for the purpose of inquiring into its exempt status and administering the provisions of subchapter F (section 501 and following), chapter 1 of subtitle A of the Code, section 6033, and chapter 42 of subtitle D of the Code. See section 6001 and § 1.6001–1 with respect to the authority of the district directors or directors of service centers to require such additional information and with respect to the books of account or records to be kept by such organizations.

In Rev. Rul. 58-617, 1958-2 CB 260, (Jan. 01, 1958) Rulings and determinations letters granting exemption from federal income tax to an organization described in section 501(a) of the Internal Revenue Code of 1954, to which contributions are deductible by donors in computing their taxable income in the manner and to the extent provided by section 170 of the Code, are effective only so long as there are no material changes in the character of the organization, the purposes for which it was organized, or its methods of operation. Failure to comply with this requirement may result in serious consequences to the organization for the reason that the ruling or determination letter holding the organization exempt may be revoked retroactively to the date of the changes affecting its exempt status, depending upon the circumstances involved, and subject to the limitations on retroactivity of revocation found in section 503 of the Code.

In Rev. Rul. 59-95, 1959-1 C.B. 627, an exempt organization was requested to produce a financial statement and statement of its operations for a certain year. However, its records were so incomplete that the organization was unable to furnish such statements. The Service held that the failure or inability to file the required information return or otherwise to comply with the provisions of section 6033 of the Code and the regulations which implement it. may result in the termination of the exempt status of an organization previously held exempt, on the grounds that the organization has not established that it is observing the conditions required for the continuation of exempt status.

In Rev. Rul. 67-5, 1967-1 C.B. 123, a foundation controlled by the creator's family is operated to enable the creator and his family to engage in financia activities which are beneficial to them, but detrimental to the foundation. This has resulted in the foundation's ownership of non-income-producing assets which prevent its carrying on a charitable program commensurate in scope with its financial resources. Held, the foundation is operated for a substantial non-exempt purpose and serves the private interests of the creator and his family, and therefore is not entitled to exemption from Federal income tax under section 501(c)(3) of the Internal Revenue Code of 1954

In Rev. Rul. 74-600, 1974-2 C.B. 385, the placing of paintings owned by a private founcation in the residence of a substantial contributor, a disqualified person, constitutes an act of self-dealing under section 4941(d)(1)(E) of the Code.

Catalog Number 20810W Page 29 www.irs.gov Form **886-A** (Rev. 5-2017)

Form <b>886-A</b> (May 2017)	Department of the Treasury – Internal Revenue Service  Explanations of Items	Scheaule number or exhibit
Name of taxpayer	Tax Identification Number (last 4 digil	's, Year/Period ended

In <u>Better Bus</u>. Bureau v. United States, 326 U.S. 279 (1945), the United States Supreme Court held that for an organization to qualify for tax exempt status, the organization must be exclusively devoted to an exempt purpose and the presence of a single nonexempt purpose, if substantial in nature, will destroy the exemption regardless of the number or importance of truly exempt purposes.

In <u>Community Education Foundation v. Commissioner</u>, T.C. Memo 2016-223, the Tax Court held that Community Education Foundation, no longer qualified for exemption from Federal income tax under section 501 (a) because it did not meet the operational test requirements for a section 501(c)(3) organization. Specifically, the organization over time did not meaningfully organize or allocate resources to any of ts activities mentioned in its application for exemption.

In <u>Salvation Navy v. Commissioner</u>, T.C. Memo 2002-275 (2002), the court found that one of the reasons why the organization did not qualify for exemption from federal income tax was because it could not provide that its net earnings would not inure to the benefit of a private individual which was its founder.

In <u>Greg R. Vinikoor v. Commissioner</u>, T.C. Memo. 1998-152, the Tax Court held that whether a financial transaction constitutes a loan depends on all the facts and circumstances, including whether (1) there was a promissory note or other evidence of indebtedness; (2) interest was charged; (3) there was security or collateral; (4) there was a fixed maturity date; (5) a demand for repayment was made; (6) any actual repayment was made; (7) the transferee had the ability to repay; (8) any records maintained by the transferor and/or the transferee reflected the transaction as a loan; and (9) the manner in which the transaction was reported for Federal tax purposes.

In <u>Old Dominion Box Co., Inc. v. United States</u>, 477 F.2d 340 (4th Cir. 1973) the Court said operating for the benefit of private parties who are not members of a char table class constitutes such a substantial nonexempt purpose.

In <u>Leon A. Beeghly v Commissioner</u>, 35 T.C. 490 (1960), provided that where an exempt organization engages in a transaction with a related interest and there is a purpose to benefit the private interest rather than the organization, exemption may be lost even though the transaction ultimately proves profitable for the exempt organization.

#### TAXPAYER'S POSITION

No formal written position has been provided to the initial report issued

Form <b>886-A</b> (May 2017)	Department of the Treasury – Internal Revenue Service  Explanations of Items	Scheaule number or exhibit	
Name of taxpayer	Tax dentification Number (last 4 digits)	Year/Period ended	

# <u>Activities</u>

	response to IDR-06 and the request for docurnder examination the following statements wer		
3.	Documentation of such as for . This includes but , , etc.	of the It is not limited to	and the use of the
	"During the period under audit there were enclosed and related to the	of the	. We have
	the the was not suitable for .  At this time the of ceased to and cf the were re-	lace in the . There wa time. Because of the	
4.	Documentation of any other activities conduc	eted by	
	" are scheduled in and another	in the near future. See	e attached.*
5.	According to Revenue Ruling in the of a constitutes an of - under section owns ( , , , , a		Code. h are maintaines in the

Form <b>886-A</b>		ury – aternal Revenue Service	Scheoule number
(May 2017)	Explanati	ons of Items	or exmibit
Name of taxpayer	-	Tax Identification Number (las: 4 digits,	Year/Period ended
further Ruling	an exempt purpose under l	RC 501(c)(3) taking into conside	ration Revenue
"Revenue Ruling the	- describes a situation receiving a from		esulting in
After placing the are	placed them in the		of , a ne
in a of the	devoted to	anc other works cf ."	
•	stion are only stored in the if they additional	. wou	ld incur
	ie . did not nder audit). Therefore, unlik received no bene	e the situation referred to in Reve	, enue at
GOVERNMENT'S PO	OSITION		
under section 501(c)(	position that you are a 3) should be revoked effecti		ur ex <del>e</del> mption
Type of Private Found	<u>dation</u>		
exemption letter issue representations you nethat valuring the years at issue not meet the income to must spen investment return, wh	nade in an application for rec vas sue that you as a test or any of the three alter d at least 85 percent of its a	e a  , which was based of cognition of exemption, the IRS of the IRS of the income of the income djusted net income or its minimune active conduct of its exempt as	concluded n that e you do test, a m

Form <b>886-A</b> (May 2017)					
Name of taxpayer		Tax Identification Number flast 4 digits;	Year/Feriod ended		
first alternative test is the fair market value conduct of exempt a     it is reported         exemp     directly is exempt activities. Mo     . The         and not for a test. Generally, to modistributions directly. Treas. Reg. § 53.494 for exempt purposes alternative test is the     1. At least 85 pe     received from     2. Not more than     normally received.     3. Not more than     income.     Treas. Reg. §	s the asset test. To meet the of a foundation's assets muctivities. Treas. Reg. § 53.4 that % of the are tactivities. However, substants to the active conduct of exert extractions of the were for the any exempt activities. The extraction the endowment test, a form for exempt purposes of at least 2/3rd of its support test. There are threat the general public and 5 or in 25 percent of its support (of the dived from any one exempt or in 50 percent of its support is 53.4942(b)-2(c)(1).	alternative test is the endoundation must make qualifying ast 2/3rd of the minimum investment and qualifying distributions make qualifying distributions minimum investment return. The requirements to meet the suppart gross investment income) is remore unrelated exempt organization and normally received from gross investment income	ean haif of e active ne Form uct of the were eve no and owment ent return. directly e third oort test: normally tions, ne) is		
Here, you had and \$ , of gross and .	from the general public in does not meet the s	e, no support from exempt organi with no in support test.	izations		
	income test or any of the thr , but a private	ee alternative tests. You are not exempt under IRC §			
Exemption as a Priva	ate Non-Operating Foundation	o <u>n</u>			
The organization doereasons:	es not qualify for exemption ເ	inder IRC § 501(c)(3) for the follo	cwing		
1. The of 2. The 501(c)(3).		, and for the solution of the	ne upkeep §		

Catalog Number 20810W

Form <b>886-A</b> (May 2017)		asury – irternal Revenue Service tions of Items	Schepule number or exhibit
Name of taxpayer		Tax dentification Number (last 4 digits)	Year/Period ended
3. The	assets inured to the	e benefit of the	
Exempt Purpose			
Pursuant to your Fon	n 1023 application the	was formed to:	
"To receive co activities to ,	ntributions from the Initial , and ."	member and to provide programs and	and
Pursuant to you Form	1 990-PF, the	was formed to:	
"to benefit and en held for future	and maintain the joyment of improvement's and ."	in its . The entire cash of the and to p	for the n balance is being pay the
Sometime after the IF of is a for the upkeep of	RS granted exemption to the , specifically the . The	anc to the of purpose to , is not an exempt purpo	ed from the of which , and
Operational test			
primarily in activities	which accomplish one or n	ation must show that they engage nore of such exempt purposes spo (Treasury Regs. § 1.501(c)(3)- 1	ecifiec in
The activities of a charitable contribution from fiscal examination the Supplementary Inform	years , to made no charitable	exempt under IRC § 509(a) ar only made charitable contribu , . During the contributions. The response to F utions paid during the year was	otions of unaer

Form <b>886-A</b> (May 2017)	Francisco efiliano		
Name of taxpayer		Tax dentification Number (lest 4 digr.s)	Year/Perioc ended
-			
did not r	eport any charitable activitie	r of Direct Charitable Activities), t s during the been provided that shows the	he . The
has made the	available for	. In fact,	
	re exempt under IRC § 501(c	· · · · · · · · · · · · · · · · · · ·	to
the .	,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
As a assets that it holds.	•	uirec to make minımum distributione the	
during the	the did not make		in nination
the	•	was some exclusion to making	mation,
distributions if you ha		ion that was reliec on to support	this
		as summitted in response. The	
should have made d	•	not only the . Investin	_
does no	t relieve a	from the distribution requiremen	it.
other activities condu	nt requests No 04 and 06 we ucted by the . In r dence and documentation o . This documentation cons	f	ion of any :
; requests		nd In respon	se to :DR-
06, it was stated that		" aue to the	
and			
submitted of	organized by the displayment was an email for		nd in
extremely limited	a was ar email for . Ti	This showed . he has no regular est	
programs to	or		abiloica
As demonstrated in I only so long as there purposes for which it Community Education concluded that the or resources to any of its	e are no material changes in twas organized, or its methon Foundation v. Commission rganizat on over time did not its activities no longer qualified not that totaled \$ over the control of the control o		, the e ourt e has not made
Due to its the operational requi	over a period of rements to continue exempt	•	ed to meet

Form <b>886-A</b> (May 2017)	Department of the Treasury – Explanations	Schedule number or exhibit	
Name of taxpayer	Tax	: Identification Number (last 4 digits)	Year/Perioc ended

#### Use of Funds/Assets

Treasury Regulations § 1.501(c)(3)-1(d)(1)(ii) states an organization is not organized or operated exclusively for one or more of the purposes specified in subdivision (i) of this subparagraph unless it serves a public rather than a private interest. Thus, to meet the requirement of this subdivision, it is necessary for an organization to establish that it is not organized or operated for the benefit of private interests such as designated individuals, the creator or his family, shareholders of the organization, or persons centro led, directly or indirectly, by such private interests.

It has not been established that the of the of the have been used for anything other than the of and for the of .

The of the have been used to benefit , and .

Transfers of Funds

	used	the bank ac	counts for			and on sev	veral occ	asions
	f	rom the	to	. In		he	\$	and in
h	е	\$ .	During the					in
and	made	of	funds for a tota	al of \$		. In respo	nse to ID	)R-05,
			were recei	ved on		, . Ac	cording :	to the
	the pur	pose of the	was for '	ſ		." No	)	was
provided i	to the		. Acco	ording to the	е		V	vas lisīed
on the		to		had	to	#he	. Yo	ou have not
shown tha	at any of		were for exe	empt purpo	ses.	In addition	, the trar	ısfer of
\$	, which	constituted	more than		of	all of the		
constitute	s significa	nt inurement	to a	•	•			
In additio	n, during	, а	in th	ne amount	of\$	was	s sent fro	om the
		to		1		. According	to the	
accountai	nt's workpa	aper the exp	enditure was a	Э		•		
appears t	o be		. The tr	ansaction v	was r	epoπed on	the Forr	n 990-PF
balance s	heet on Li	ne 7- other r	iotes and loan	s receivab	le. In	response t	ว IDR-0ร์	5, a
	with	wa	s received on	,		. The purpo		
	was to		,	. Nc		was provi	ded to the	ne
	for the	. Accordi	ng to the			of disabili	ty	t was
listed on t	:he	to:	show	had th	e abi	lity tc		, but no

Fcrm <b>886-A</b>	· ·	sury – Internal Revenue Service	Scheaule rumber or exabit		
(May 2017)	•				
Name of taxpayer		Tax Identification Number (last 4 digits)	Year/Period ended		
Also, the terms of the in the	were not made.	would be , yet the imemation that any action was t	aken wnen		
These , or any of due to the risk assoc	ther change in and if they did the	tions for the in case  No bank would make a p  would generally be at a .	of default, percent		
There are no minutes of Incorporation, in excess of \$ right to determine ho constitutes a signification purposes.	has the power to , by as w the wou	. According to Article 6 of approve the transfer of the corp . The bylaws gave .lld be used. The to which were used for r	oration s the		
According to the for to for the According to the for the position No contemporaneous to purchase documentation providing ayments were made filed Form funds as acts of	e payments were not grants , , statement, Chec he of , statement, Chec of that were ded documentation was provide for the ded was created almost e to and to n to report the acts of , engage vs that the	to the ck # was a payment to to the a reimbursement for the cost of ed from of the intention of and receive later in at the time th . In made to with	to  . It is the the .  The only e  , the the reported swith the		
Investments  During the fiscal year  or normal"  invested	such as , ,	, etc., th∈	raditional : By		

Form <b>886-A</b> (May 2017)		sury – nternal Revenue Serv	ice	Schedule number or exnibit
Name of taxpayer		Tex Identification Numb	er (last 4 digits)	Year/Period ended
	year , , the enti , less in funds that could served as a vehicle to		a loss anc the or exempt our	
Noncash Assets The other of them to the them to the locate are locate	. The other . The other ed ; - located	er than the of the in	before are located aclude: -located in the	l in the
	was able to receive a chari , , , , , a n be enjoyed	did not re i table deduction and	inquish contro d still retain co benefit the	
The assets are only or app advertisement from t	roval by the of the		ccess is limited There is no are	l to
It is the position of the problem since wathis also means that . The placement inurement.	s not in from was also	, through . This situation is	similar to Rev	is not a lowever, /. Rul. 74- results in
used as a  ha  made use of the func  the benefit of  maintained control or	ad control over the ds for . The . These were do ver them. used for the of	inancial activities th , , , of the onated in name only I the of the	nat were bene and int y since still y since still no n	; ured to nake ctivities

Form <b>886-A</b> (May 2017)	Department of the Treas_ry - Internal Revenue Service  Explanations of Items	Schedule number or exhibit
Name cf taxpayer	Tax notation Number (las	t 4 digits) Year/Feriod ended

# **CONCLUSION:**

001102001011	••					
Though the the activities to through establi during the	but is the shed programs	or !	of purposes	. The either thro	is not own ere were no signif ugh has been	
	were	inure to	dy source	of funds fo	r .	sh
previously in			in		. During the	
to ( instead of waiti	; and for		, ds were us		to and were used when	had of funds
_	ngling of	s should be ma with the to the	nintained b ; and	_	, and this o owned by the	
Accordingly, status as an organization described status as an organization described sunder section 501(c)(3) should be revoked, effective , because it was not operated for an exempt purpose and the assets were not used for exclusively charitable purposes.						
Corporate Inco	me Tax Return	xable and Form 990- s under section	PF Return	of	file ooth Form 112 . Con	20 U.S. tributions are