

Entered in PCC

Internal Revenue Service

JAN 27 1970

TS:MS:EO:R-4:BKW

Athletes for Youth, Inc.
700 W. Wisconsin Avenue
Milwaukee, Wisconsin 53233

Gentlemen:

Based on the information supplied, we rule that you are exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code. This ruling assumes your operations will be as stated in your exemption application.

In this letter we are not determining whether you are a private foundation as defined in new section 508(b) of the Code which sets forth requirements for establishing that an organization exempt under section 501(c)(3) is not a private foundation. When procedures are developed to implement these new requirements, we will advise you how to proceed to notify the Internal Revenue Service if you do not believe yourself to be a private foundation.

For years beginning prior to January 1, 1970, you are required to file the annual information return, Form 990-A. For each subsequent year, please refer to the instruction accompanying the Form 990-A for that particular year to determine whether you are required to file. If filing is required, you must file the Form 990-A by the 15th day of the 5th month after the end of your accounting period.

You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business tax income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T. In this letter we are not determining whether any of your present or proposed activities is unrelated trade or business as defined in section 513 of the Code.

Re: Athletes for Youth Inc.

You are not liable for Federal unemployment taxes. You are liable social security taxes only if you have filed waiver of exemption certificates as provided in the Federal Insurance Contributions Act. (Your District Director will be glad to tell you more about this latter point).

Donors may deduct contributions to you, as provided by section 170 of the Code. Bequests, legacies, devises, transfers, or gifts, to you or for your use are deductible for Federal estate and gift tax purposes under sections 2055, 2106, and 2522 of the Code.

If you change your purposes, character, or method of operation, please let your District Director know, so that he may consider the effect on your exempt status. Also, please keep him informed of any changes in your name or address.

You need an employer identification number, even if you don't have any employees. The number is to be used on all your tax returns and in your correspondence with the Internal Revenue Service. If you don't have such a number, please file Form SS-1, Application for Employer Identification Number, with your District Director.

We are informing your District Director of this ruling. Thank you for your cooperation.

Sincerely yours,

John R. Barber
Chief, Ruling Section
Exempt Organizations Branch