

Internal Revenue Service

Department of the Treasury

District
Director

Entered in RCG

Person to Contact: *A. BUCHEK*

Telephone Number: *(312) 986-1278*

Refer Reply to: *EO:201*

Date: *APR 02 1984*

Employer Identification Number

39-1472187

Advance Ruling Period Ends:

AUGUST 31, 1988

CITY OF FESTIVALS PARADE INC
200 EAST WELLS STREET
MILWAUKEE, WI 53202

Dear Applicant:

Based on information supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from Federal income tax under Section 501(c)(3) of the Internal Revenue Code.

Because you are a newly created organization, we are not now making a final determination of your foundation status under Section 509(a) of the Code. However, we have determined that you can reasonably be expected to be a publicly supported organization described in Section 509(a)(1) AND 170(L)(1)(A)(vi).

Accordingly, you will be treated as a publicly supported organization, and not as a private foundation, during an advance ruling period. This advance ruling period begins on the date of your inception and ends on the date shown above.

Within 90 days after the end of your advance ruling period, you must submit to us information needed to determine whether you have met the requirements of the applicable support test during the advance ruling period. If you establish that you have been a publicly supported organization, you will be classified as a Section 509(a)(1) or 509(a)(2) organization as long as you continue to meet the requirements of the applicable support test. If you do not meet the public support requirements during the advance ruling period, you will be classified as a private foundation for future periods. Also, if you are classified as a private foundation, you will be treated as a private foundation from the date of your inception for purposes of Section 507(d) and 4940.

Grantors and donors may rely on the determination that you are not a private foundation until 90 days after the end of your advance ruling period. If you submit the required information within the 90 days, grantors and donors may continue to rely on the advance determination until the Service makes a final determination of your foundation status. However, if notice that you will no longer be treated as a Section organization is published in the Internal Revenue Bulletin, grantors and donors may not rely on this determination after the date of such

publication. Also, a grantor or donor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act that resulted in your loss of Section 504(a)(1)* status, or acquired knowledge that the Internal Revenue Service had given notice that you would be removed from classification as a Section 504(a)(1)* organization.

If your sources of support, or your purposes, character, or method of operation change, please let us know so we can consider the effect of the change on your exempt status and foundation status. Also, you should inform us of all changes in your name or address.

Generally, you are not liable for social security (FICA) taxes unless you file a waiver of exemption certificate as provided in the Federal Insurance Contributions Act. If you have paid FICA taxes without filing the waiver, you should call us. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Organizations that are not private foundations are not subject to the excise taxes under Chapter 42 of the Code. However, you are not automatically exempt from other Federal excise taxes. If you have any questions about excise, employment, or other Federal taxes, please let us know.

Donors may deduct contributions to you as provided in 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 if they meet the applicable provisions of Section 2055, 2106, and 2522 of the Code.

You are required to file Form 990, Return of Organization Exempt from Income Tax, only if your gross receipts each year are normally more than \$25,000. If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. The law imposes a penalty of \$10 a day, up to a maximum of \$5,000, when a return is filed late, unless there is reasonable cause for the delay.

You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business 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 are unrelated trade or business as defined in Section 513 of the Code.

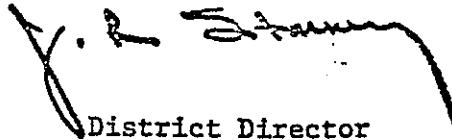
You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, a number will be assigned to you and you will be advised of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

Because this letter could help resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

*AND 170(b)(1)(A)(vi)

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,


District Director

BEGINNING JANUARY 1, 1984 UNLESS
SPECIFICALLY EXCEPTED, YOU MUST
PAY TAXES UNDER FICA: (SOCIAL
SECURITY TAXES) FOR EACH EMPLOYEE
WHO IS PAID \$100.00 OR MORE A YEAR.

Letter 1045(DO)(6-77)

Form 872-C

(Rev. July 1981)

Department of the Treasury—Internal Revenue Service

**Consent Fixing Period of Limitation
Upon Assessment of Tax Under Section
4940 of the Internal Revenue Code**
(See instruction 2 of Part IV—Form 1023 instructions.)

OMB No. 1545-0056

Expires May 31, 1984

To be used with Form
1023. Submit in
duplicate.

Under section 6501(c)(4) of the Internal Revenue Code, and as part of a request filed with Form 1023 that the organization named below be treated as a publicly supported organization under section 170(b)(1)(A)(vi) or section 509(a)(2) during an extended advance ruling period,

City of Festivals Parade, Inc.

(Name of organization)

200 East Wells Street

Milwaukee, Wisconsin 53202

(Number, street, city or town, State, and ZIP code)

District Director

and the

consent and agree that: (check one)

- ☒ If the first tax year in the extended advance ruling period is at least 8 months long, then the period for assessing tax (imposed under section 4940 of the Code) for any of the 5 tax years in the extended advance ruling period will extend 8 years, 4 months, and 15 days beyond the end of the first tax year.
- ☐ If the first tax year in the extended advance ruling period is less than 8 months long, then the period for assessing tax (imposed under section 4940 of the Code) for any of the 6 tax years in the extended advance ruling period will extend 9 years, 4 months, and 15 days beyond the end of the first tax year.

However, if a notice of deficiency in tax for any of these years is sent to the organization before the period expires, then the time for making an assessment will be further extended by the number of days the assessment is prohibited, plus 60 days.

Ending date of first tax year. August 31, 1984

Name of organization

City of Festivals Parade, Inc.

Date

2/24/84

Officer or trustee having authority to sign

Signature

District Director

Date

By

For Paperwork Reduction Act Notice, see page 1 of the Form 1023 instructions.