

Washington, DC 2022-

Entered in PCG

Corporation for Maintaining
Editorial Diversity in America
c/o Ropes & Gray
Room 2400
225 Franklin Street
Boston, MA 02110

Person to Contact:

Telephone Number:

Refer Reply to:

E:EO:T:R:1-1

Date:

26 OCT 1981

Employer Identification Number: 04-2706126
Key District: Boston
Form 990 Required: /X/ Yes / / No
Accounting Period Ending: December

Dear Sir or Madam:

We have reconsidered your application for recognition of exemption from federal income tax under section 501(c)(3) of the Internal Revenue Code. In a proposed ruling dated February 12, 1981, we concluded that you did not qualify for exemption under section 501(c)(3) of the Code. Since that ruling was issued, you agreed to amend your Article of Organization and change your proposed activities to comply with the requirements of section 501(c)(3). Based on your representations that you have changed your organization and operations we have determined that you qualify for exemption from federal income tax under section 501(c)(3). This letter revokes our February 12, 1981, ruling.

Our February 12, 1981, ruling was made because your primary purpose, as stated in your original Articles of Organization, was to preserve and expand intellectual diversity in America by encouraging widest possible distribution of significant independent journals of opinion, whether or not organized for profit. Your proposed activities included providing general aid to publications. Thus, you were neither organized nor operated for exclusively charitable purposes because providing general, unrestricted aid to nonexempt organizations is not a charitable purpose.

You have amended your Articles of Organization to limit your purposes and authorized activities to exclusively charitable and educational purposes and you changed your proposed activities to provide that any aid you provide will serve exclusively charitable and educational purposes. Specifically, you will engage in the following activities:

1. Grants or low-interest loans to journals of opinion to support the cost of writing and publishing articles on educational and cultural topics selected by the Corporation, including overhead costs in connection with such articles;

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2. Grants or low-interest loans to such journals to support the cost of production and mailing of publications to libraries, universities, and other organizations exempt under Section 501 of the Internal Revenue Code;

3. Grants or low-interest loans to such journals to cover the cost of production and mailing of publications to opinion-making groups, including editorial writers and Congressional leaders;

4. Grants or low-interest loans to such journals to cover the cost of production and mailing of reprints or articles to individuals and organizations which have expressed interest in a particular topic, provided the Corporation determines that the articles reprinted are educational or cultural in nature.

5. Purchase of publications or reprints direct from publishers and mailing of such publications or reprints to any individuals or organizations included within items 1-4 above. A reasonable charge may be made to the recipient for mailing and related services.

Based on the information supplied, and assuming your operations will be as you represented, we have determined you are exempt from federal income tax under section 501(c)(3) of the Code.

We have further determined that you are not a private foundation within the meaning of section 509(a) of the Code, because you are an organization described in section 509(a)(1) and section 170(b)(1)(A)(vi).

If your sources of support, or your purposes, character, or method of operation change, please let your key district know so that office can consider the effect of the change on your exempt status and foundation status. Also, you should inform your key District Director of all changes in your name and 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 contact your key District Director. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Since you are not a private foundation, you 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, contact any Internal Revenue Service office.

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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.

The box checked in the heading of this letter shows whether you must file Form 990, Return of Organization Exempt from Income Tax. If yes is checked, you are required to file Form 990 only if your gross receipts each year are normally more than \$10,000. 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.

Please use your employer identification number, 04-2706126, on all returns you file and in all correspondence with the Internal Revenue Service.

We are informing your key District Director of this action. Because this letter could help resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

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

Sincerely yours,

~~J. E. Griffith~~

J. E. Griffith
Chief, Rulings Section 1
Exempt Organizations Technical Branch

Date: 26 OCT 1937

Person to Contact:

Mr. Kaplan
Contact Telephone Number:
(202) 566-3969
Refer Correspondence to:

E:EO:T:R:1-1

Mrs. Carolyn M. Osteen
Ropes & Gray
225 Franklin Street
Boston, MA 02110

Dear Mrs. Osteen:

The enclosed copy of a letter is sent to you under the provisions of a Power of Attorney, Authorization and Declaration, or other proper authorization currently on file with the Internal Revenue Service.

Sincerely yours,

J. E. Griffith
J. E. Griffith

Chief, Rulings Section 1
Exempt Organizations Technical Branch

Enclosure:
Copy of letter