

Internal Revenue Service  
District Director

Department of the Treasury

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Date: MAY 27 1983

MAY 02 1983

Our Letter Dated:

September 26, 1979

Person to Contact:

G. Storey/cjs

Contact Telephone Number:

(404)221-4516

EIN: 59-1887705

File Folder Number 580006304

Global Foundation, Inc.  
6200 Leonard Street  
Coral Gables, Florida 33146

Dear Applicant:

This modifies our letter of the above date in which we stated that you would be treated as an organization which is not a private foundation until the expiration of your advance ruling period.

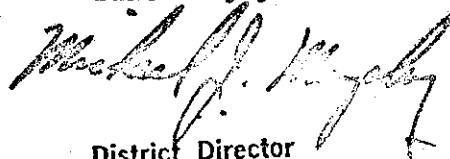
Based on the information you submitted, we have determined that you are not a private foundation within the meaning of section 509(a) of the Internal Revenue Code, because you are an organization of the type described in section 509(a)(2). Your exempt status under section 501(c)(3) of the code is still in effect.

Grantors and contributors may rely on this determination until the Internal Revenue Service publishes notice to the contrary. However, a grantor or a contributor 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 509(a)(2) status, or acquired knowledge that the Internal Revenue Service had given notice that you would be removed from classification as a section 509(a)(2) organization.

Because this letter could help resolve any questions about your private foundation status, please keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown above.

Sincerely yours,



District Director

Your classification as an organization which is not a private foundation is being changed from section 170(b)(1)(A)(vi) and 509(a)(1) to section 509(a)(2) because the support you have received is the type described in section 509(a)(2).