Internal Revenue Service **District Director**

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Pate: DEC 08 1988

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Department of the Treasury

Employer Identification Number: 52-1562427 Contact Person: ARTHUR BLUME Contact Telephone Number: (202) 376-0035

Accounting Period Ending: December 31 Foundation Status Classification: 509(a)(1)Advance Ruling Period Ends: Dec. 31, 1992 Cavest Applies: yes

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.

Accordingly, you will be treated as a publicly supported organization, and not as a private foundation, during an advance ruling period. dvance ruling period begins on the date of your inception and ends on the ≾ate 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 sections 507(d) and 4940.

Grantors and contributors 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 contributors may continue to rely on the advance determination until the Service makes a final determination of your foundation status.

If notice that you will no longer be treated as a publicly supported organization is published in the Internal Revenue Bulletin, grantors and contributors may not rely on this determination after the date of such publication. In addition, if you lose your status as a publicly supported organization and a grantor or contributor was responsible for, or was aware of, the act or failure to act that resulted in your loss of such status, that person may not rely on

Letter 1045(DO/CG)