

JUN 08 1983

The Nature Conservancy
1800 North Kent Street
Arlington, Va. 22209

Form: 990

Tax Year Ended: December 31, 1980

Exemption under Section 501(c)(3) of the
Internal Revenue Code

Person to Contact: J. Bezila

Contact Telephone Number: (202) 376-0026

Our recent examination of the above information return disclosed that your organization continues to qualify for exemption from Federal income tax. Accordingly, the return is accepted as filed.

However, the following marked item(s) were noted:

- ☐ Our review of your return, Form 990, and related records indicated that you did not file Forms 1099. Under section 6041 of the Internal Revenue Code, you are required to issue Forms 1099 to recipients of prizes, awards, or fees of \$600 or more during a calendar year. Even though we have now obtained these returns, your organization may be responsible for filing similar forms in future years.
- ☐ During the examination, it was determined you did not file when due Forms 940, Employer's Annual Federal Unemployment Tax Return, or 941, Employer's Quarterly Federal Tax Return, for wages paid to employees. Under section 6011 of the Internal Revenue Code, you are required to file Forms 940 and 941 when wages are paid for services rendered.
- ☐ Our examination of your organization indicates that you did not file Form 990 (or Form 990-PF) by the due date. Section 6652(d) of the Internal Revenue Code provides for a penalty of \$10 for each day the return is late (not to exceed \$5,000), unless there is reasonable cause for the late filing.
 - ☐ You established that you had reasonable cause for filing this return late; therefore, the \$10 a day penalty will not be charged. However, there may be a penalty if your return is not filed when due for the same reason in a future year.
 - ☐ You were previously billed for this penalty by the service center and there will be no additional penalties. Please be sure to file your return when due to avoid a penalty in the future.
 - ☐ You did not establish reasonable cause for filing late. Therefore, you will receive a bill from the service center for the late filing penalty.

(over)

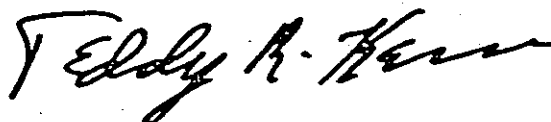
properly allocated between exempt activities and investment activities.

- ☐ During the examination of your Form 990, we noted that you combined income from different sources instead of reporting the separate amounts as required. When filing future returns, please show each source of income and amount on the appropriate line on your return.
- ☐ Your current records do not appear to comply with Revenue Procedure 80-53, 1980-2 C.B. 848, which requires you to include fringe benefits in gross income reported on Forms W-2 even if these benefits are not subject to income tax withholding. To avoid a penalty in the future, full compliance is required.
- ☐ During the examination of your Form 990, we noted that some amounts shown on the balance sheet did not reflect those recorded in your books of account. For future years, you should provide accurate figures on your return to avoid a possible penalty under section 6652(d)(1) of the Internal Revenue Code.
- ☐ During the review of your Form 990, we determined that your organization did not identify its special fundraising activities. When future returns are filed, you should complete part 1, line 9, of Form 990 and prepare the required schedule for fundraising activities, including the amounts of receipts and expenses. Omitting material information on your Form 990 may subject you to a penalty under section 6652(d)(1) of the Internal Revenue Code.
- ☒ See attachment to Letter 1656(DO)

☒ This letter supersedes our letter dated March 23, 1982.

We will appreciate your compliance with the above requirements.

Sincerely yours,



District Director

Attachment to Letter 1656

- ☒ During the review of your return, we noted that you did not attach a list of names and addresses of all officers, directors or trustees to your return. Section 1.6033-(2)(a)(2)(ii)(g) of the Income Tax Regulations requires that this information be submitted with your annual return. Please insure that this information is included in all future returns filed by your organization.
- ☐ We noted that your _____ were amended in _____. Please be advised that these changes do not affect your exempt status. As a requirement for retaining your exempt status any change in your organizational instruments must be reported to the appropriate Key District Director. You may, if you wish, submit a copy of such amendments when you file your annual return.
- ☐ As a result of the examination, we determined that all of your assets, liabilities, and net worth were not shown on the return. You should complete the appropriate lines of Part V of Form 990 (or Part III of Form 990-PF) on subsequent returns.
- ☐ Your return(s) for the year(s) under examination did not show all of your gross receipts or expenditures. In particular, it showed only the net profit or loss from some of your activities. Section 6033(a)(1) of the Internal Revenue Code provides in part as follows: "... every organization exempt from taxation under section 501(a) shall file an annual return, stating specifically the items of gross income, receipts, and disbursements, and such other information for the purpose of carrying out the internal revenue laws as the Secretary may by forms or regulations prescribe ..."

Failure to report all gross receipts and all expenditures on your return in the future may subject you to penalties mentioned in Revenue Ruling 77-162, 1977-1 C.B. 400, dealing with the filing of incomplete returns.

☐

Internal Revenue Service

District
Director

Department of the Treasury

Telephone: (202) 376-0026
1201 E St., N.W., Washington, DC 20225

MAR 23 1982

▷ The Nature Conservancy, Inc.
1800 N. Kent Street, # 800
Arlington, VA. 22209

EP/EO:7202: JB


Gentlemen:

We have reviewed your activities and examined your financial records for the year ended December 31, 1980 and find that your tax-exempt status continues. Your Form 990 for the period indicated is accepted as filed.

We noted, however, that you did not attach a list of names and addresses of your officers, directors or trustees. Section 1.6033-2(a)(2)(ii)(g) of the Income Tax Regulations, a copy of which is enclosed, requires that this information be submitted with your annual return.

Your cooperation during this examination has been greatly appreciated.

Sincerely yours,


Teddy R. Kern
District Director

Enclosure



District Director
Internal Revenue Service

Date:

May 11, 1976

In reply refer to:

EP:EO:7300

► The Nature Conservancy
1800 North Kent St.
Arlington, Virginia 22209

Form Number: 990
Periods Ended: Dec. 1973

We are pleased to tell you that as a result of our examination for the above periods we will continue to recognize your organization as tax-exempt.

We have indicated below whether there is a change in your liability for the unrelated business income tax as provided by sections 511 through 515 of the Internal Revenue Code.

- ☒ There is no change.
- ☐ You will receive an examination report explaining the proposed adjustments.

Thank you for your cooperation.

Sincerely yours,

District Director



Internal Revenue Service
Washington, DC 20224

Date:

Dec. 21, 1970

In reply refer to:

T:MS:EO

► The Nature Conservancy
1800 North Kent Street
Arlington, Virginia 22209

Gentlemen:

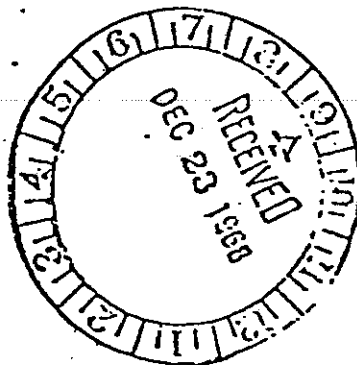
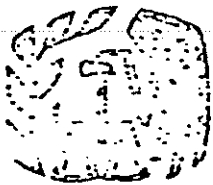
In accordance with the notifications you recently submitted, you and the organizations you operate, supervise, or control (and which are covered by your notifications) have been classified as organizations that are not private foundations as defined in section 509(a) of the Internal Revenue Code.

This classification is based on the assumption that operations will continue in the manner that constitutes the basis for such classification. Any changes in purposes, character, or method of operation must be reported to us so we may consider the effect on status.

Sincerely yours,

J. A. DeLoach
Chief, Rulings Section
Exempt Organizations Branch

FORM R-0706 (8-70)



Internal Revenue Service
Washington, DC 20224

Date:

In reply refer to

DEC 19 1968

T:I:I:1:1

The Nature Conservancy
1522 K Street, N. W.
Washington, D. C. 20005

Attention: Z. R. Kingman
Vice President

Gentlemen:

This is in reply to your letter dated October 9, 1968, requesting a ruling that you qualify as a "publicly supported" organization under section 170(b)(1)(A)(vi) of the Internal Revenue Code so that contributions to you are subject to the special limitation provisions of section 170(b)(1)(A) of the Code.

Under section 170(b)(1)(A) of the Code an individual is allowed an additional deduction not exceeding 10 percent of his adjusted gross income for contributions made to certain organizations, including an organization described in section 170(b)(1)(A)(vi) of the Code.

Section 170(b)(1)(A)(vi) of the Code describes an organization referred to in section 170(c)(2) which normally receives a substantial part of its support (exclusive of income received in the exercise or performance by such organization of its charitable, educational, or other purpose or function constituting the basis for its exemption under section 501(a)) from a governmental unit referred to in section 170(c)(1) or from direct or indirect contributions from the general public.

The information submitted with your request discloses the following:

You are exempt from Federal income tax as an organization described in section 501(c)(3) of the Code, which is substantially similar to section 170(c)(2), and contributions to you are deductible under section 170 of the Code.

You were incorporated in October 1951 as a nonprofit corporation under the laws of the District of Columbia. Your purposes, as set forth in your Certificate of Incorporation, are (a) to preserve or

aid in the preservation of all types of wild nature, including natural areas, features, objects, flora and fauna, and biotic communities; (b) to establish nature reserves or other protected areas to be used for scientific, educational, and esthetic purposes; (c) to promote the conservation and proper use of natural resources; (d) to engage in or promote the study of plant and animal communities and of other phases of ecology, natural history, and conservation; and (e) to promote education in the fields of nature preservation and conservation.

It is stated that your primary objective is to acquire and to protect outstanding natural areas. By early 1963, you had been instrumental in having nearly 95,000 acres set aside as sanctuaries and preserves throughout the United States, and you anticipate that you will reach the 100,000 acre mark before the end of the calendar year. You acquire land either by gift or by purchase and a great deal of this procurement is for Federal, state and local governments. Your activities include the chartering of local subordinate chapters to perform local functions in carrying out your purposes.

Your by-laws provide for several classes of membership and specify the contribution required for membership in each membership class. Membership in your organization is open to any individual or organization approving of your objectives.

You are governed by a Board of Governors which presently consists of a Chairman of the Board, a Vice Chairman, Secretary, Treasurer and twenty-one members at large. It is stated that the members at large are chosen, insofar as possible, because of their skills, varied interests, and their deep and devoted interest in the conservation of this country's natural resources and an abiding love of the land itself. Additionally, an attempt is made to have the Board represent as many areas of the country as possible.

Your support for the four fiscal years June 30, 1965 through June 30, 1968, was derived substantially from contributions received directly and indirectly from the general public, as well as from membership dues and investment income. An article in the Sunday, November 10, 1968, issue of the Washington Post states that the Ford Foundation is giving you \$6 million to buy 97 tracts of land and hold them for later government use. Your method of making financial reports available to the public has been through your publication, The Nature Conservancy News. In addition to printing a summary in the News, you have always carried a notice stating that the complete financial statement was available upon request to your national headquarters office.

The facts and circumstances presented indicate that you are a publicly supported organization described in section 170(b)(1)(A)(vi) of the Code. Accordingly, the special limitation provided in section 170(b)(1)(A) of the Code is applicable to contributions made to you by individual donors.

Very truly yours,

Lester A. Zetter

Chief, Individual Income Tax Branch