

In reply refer to: 0248562350 Dec. 31, 2008 LTR 4168C E0 36-6151680 000000 00 000 00021734

BODC: TE

PHILADELPHIA SOCIETY % DANIEL B HALES 11620 RUTAN CIR JEROME MI 49249-9661208

Employer Identification Number: 36-6151680 Person to Contact: Mr. Edwards Toll Free Telephone Number: 1-877-829-5500

Dear Taxpayer:

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This is in response to your request of Dec. 18, 2008, regarding your tax-exempt status.

Our records indicate that a determination letter was issued in July 1967, that recognized you as exempt from Federal income tax, and discloses that you are currently exempt under section 501(c)(03) of the Internal Revenue Code.

Our records also indicate you are not a private foundation within the meaning of section 509(a) of the Code because you are described in section 509(a)(2).

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 sections 2055, 2106, and 2522 of the Code.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely yours,

Michele M. Sullivar

Michele M. Sullivan, Oper. Mgr. Accounts Management Opérations I Entered in PCG

Internal Revenue Service

Date: December 14, 2004

PHILADELPHIA SOCIETY
% DANIEL B HALES
11620 RUTAN CIR
JEROME MI 49249-9661

Department of the Treasury P. O. Box 2508 Cincinnati, OH 45201

Person to Contact: .

Ronnie Clemons 31-04020 Customer Service Representative

Toll Free Telephone Number: 8:00 a.m. to 6:30 p.m. EST 877-829-5500

Fax Number: 513-263-3756

Federal Identification Number: 36-6151680

Dear Sir or Madam:

This is in response to your request of December 14, 2004, regarding your organization's taxexempt status.

In July 1967, we issued a determination letter that recognized your organization as exempt from federal income tax. Our records indicate that your organization is currently exempt under section 501(c)(3) of the Internal Revenue Code.

Our records indicate that your organization is also classified as a public charity under section 509(a)(2) of the Internal Revenue Code.

Our records indicate that contributions to your organization are deductible under section 170 of the Code, and that you are qualified to receive tax deductible bequests, devises, transfers or gifts under section 2055, 2106 or 2522 of the Internal Revenue Code.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,

Jana K Stufer

Janna K. Skufca, Director, TE/GE Customer Account Services

Internal Revenue Service

Date: March 13, 2001

Philadelphia Society % Daniel B. Hales 200 E. Randolph Dr. Ste. 7300 Chicago, IL 60601-6401

Department of the Treasury

P. O. Box 2508 Cincinnati, OH 45201

Person to Contact: Vicki Adams 31-04011 Customer Service Specialist Toll Free Telephone Number: 8:00 a.m. to 9:30 p.m. EST

877-829-5500 Fax Number: 513-263-3756

Federal Identification Number: 36-6151680

Unignall

Dear Sir or Madam:

This letter is in response to your request for a copy of your organization's determination letter. This letter will take the place of the copy you requested.

Our records indicate that a determination letter issued in July 1967 granted your organization exemption from federal income tax under section 501(c)(3) of the Internal Revenue Code. That letter is still in effect.

Based on information subsequently submitted, we classified your organization as one that is not a private foundation within the meaning of section 509(a) of the Code because it is an organization described in section 509(a)(2).

This classification was based on the assumption that your organization's operations would continue as stated in the application. If your organization's sources of support, or its character, method of operations, or purposes have changed, please let us know so we can consider the effect of the change on the exempt status and foundation status of your organization.

Your organization is required to file Form 990, Return of Organization Exempt from Income Tax, only if its 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 the organization's annual accounting period. The law imposes a penalty of \$20 a day, up to a maximum of \$10,000, when a return is filed late, unless there is reasonable cause for the delay.

All exempt organizations (unless specifically excluded) are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$100 or more paid to each employee during a calendar year. Your organization is 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, these organizations are not automatically exempt from other federal excise taxes.

Donors may deduct contributions to your organization as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to your organization or for its use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

Philadelphia Society 36-6151680

Your organization is not required to file federal income tax returns unless it is subject to the tax on unrelated business income under section 511 of the Code. If your organization is subject to this tax, it must file an income tax return on the Form 990-T, Exempt Organization Business Income Tax Return. In this letter, we are not determining whether any of your organization's present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

The law requires you to make your organization's annual return available for public inspection without charge for three years after the due date of the return. If your organization had a copy of its application for recognition of exemption on July 15, 1987, it is also required to make available for public inspection a copy of the exemption application, any supporting documents and the exemption letter to any individual who requests such documents in person or in writing. You can charge only a reasonable fee for reproduction and actual postage costs for the copied materials. The law does not require you to provide copies of public inspection documents that are widely available, such as by posting them on the Internet (World Wide Web). You may be liable for a penalty of \$20 a day for each day you do not make these documents available for public inspection (up to a maximum of \$10,000 in the case of an annual return).

ecause this letter could help resolve any questions about your organization's exempt status and foundation attus, you should keep it with the organization's permanent records.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

This letter affirms your organization's exempt status.

Sincerely,

John E. Ricketts, Director, TE/GE Customer Account Services

Internal Revenue Service Pistrict Director

Date: (1) 3 1007

Philadelphia Society
C/O Daniel B. Hales
200 E. Randolph Dr. Ste. 7300
Chicago, IL 60601-6401

Department of the Treasury

P. O. Box 2508 Cincinnati, OH 45201

Person to Contact:
Ruth Ohmer
Telephone Number:
513-241-5199
Fax Number
513-684-5936
Federal Identification Number:
36-6151680

Dear Sir or Madam:

This letter is in response to your letter dated March 26, 1997, requesting a copy of your organization's determination letter. This letter will take the place of the copy you requested.

Our records indicate that a determination letter issued in July 1967, granted your organization exemption from federal income tax under section 501(c)(3) of the Internal Revenue Code. That letter is still in effect.

Based on information subsequently submitted, we classified your organization as one that is not a private foundation within the meaning of section 509(a) of the Code because it is an organization described in section 509(a)(2).

This classification was based on the assumption that your organization's operations would continue as stated in the application. If your organization's sources of support, or its character, method of operations, or purposes have changed, please let us know so we can consider the effect of the change on the exempt status and foundation status of your organization.

Your organization is required to file Form 990, Return of Organization Exempt from Income Tax, only if its 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 the organization's annual accounting period. The law imposes a penalty of \$20 a day, up to a maximum of \$10,000, when a return is filed late, unless there is reasonable cause for the delay.

All exempt organizations (unless specifically excluded) are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$100 or more paid to each employee during a calendar year. Your organization is 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, these organizations are not automatically exempt from other federal excise taxes.

hiladelphia Society 36-6151680

Donors may deduct contributions to your organization as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to your organization or for its use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

Your organization is not required to file federal income tax returns unless it is subject to the tax on unrelated business income under section 511 of the Code. If your organization is subject to this tax, it must file an income tax return on the Form 990-T, Exempt Organization Business Income Tax Return. In this letter, we are not determining whether any of your organization's present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

Because this letter could help resolve any questions about your organization's exempt status and foundation status, you should keep it with the organization's permanent records.

Please direct any questions to the person identified in the letterhead above.

This letter affirms your organization's exempt status.

Sincerely,

C. Ashley Bullard District Director

internal Revenue Service

Department of the Treasury

Entered in PCG

District Director

North adams, mi 49262 Person to Contact: FO: TPA

Telephone Number: 3/2 886 - 557/

Refer Reply to:

Date: April 6, 1987

RE: EXEMPT STATUS EIN: 36-6151680

This is in response to the letter dated March 13, 1987 regarding your status as an organization exempt from Federal income tax.

Our records indicate that a ruling letter was issued in 1967, granting your organization an exemption from Federal 0 income tax under the provisions of Section 501(c)(3) of the Internal Revenue Code of 1954. Our records also indicate that your organization is not a private foundation but one that is described in 509(a)(a)

Contributions made to you are deductible by donors in computing their taxable income in the manner and to the extent provided in Section 170 of the Internal Revenue Code.

If your gross receipts each year are normally \$25,000.00 or more, you are required to file Form 990, Return of Organizations Exempt from Income Tax by the fifteenth day of the fifth month after the end of your annual accounting period.

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 F-990-T.

If any question arises with respect to your status for Federal income tax purposes, you may use this letter as evidence of your exemption.

This is an advisory letter.

Sincerely yours,

R. Starkey Strict Director



THE PHILADELPHIA SOCIETY

NORTH ADAMS • MICHIGAN 49262

Address any reply to:

520 Cadillac Tower, Detroit, Mich. 48226
Department of the Treasury
J. Mandia (313)226-7470 (Not toll free)

District Director

Internal Revenue Service

Pate: ΙΔΝ β. [In reply refer to: DET: 74-1096

441:208:JM

The Philadelphia Society
P.O. Box 126
North Adams, Michigan 49626



Gentlemen:

This supersedes our letter to you in which we said we classified you as a private foundation.

Based on additional information you furnished, and the assumption that your operations will be as stated, we have now classified you as an organization that is not a private foundation as defined in section 509(a) of the Internal Revenue Code, because you are an organization described in the following Code section:

Section 509(a)(2)

All changes in your purposes, character, or method of operation must be reported to your District Director so he can consider their effect on your status.

Sincerely yours,

R. L. Plate

District Director

cc: Michael M. Ushijima