Address any reply to:

P.O. Box 231, Los Angeles, Calif. 90053 Department of the Treasury

District Director

Internal Revenue Service

In reply refer to LA-E0-72-1137

JHL 31 1972

Code 421: 1504:RSD

Tel. (213) 688-4763

and Desert Area 332 West Alejo Road Palm Springs, California 92262

Purpose: Charitable

File Returns with Internal Revenue Service Center: Philadelphia, Pa.

Accounting Feriod Ending: December 31

Address Inquiries to District Director of Internal Revenue: Los Angeles, Calif.

Gentlemen:

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 rederal income tax under section 501(c)(3) of the Internal Pevenue Code.

We have further determined you are not a private foundation within the meaning of section 500(a) of the Code, because you are an organization described in section 170(b)(1)(A)(vi)

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. You are not liable for the taxes imposed under the Federal Unemployment Act (FUTA).

Since you are not a private foundation, you are not subject to the excise taxes under Chaper 12 of the Code. However, you are not automatically exempt from other Federal excise taxes.

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 under section 2055, 2105, and 2522 of the Code.

If your purposes, character, or method of operation is changed, you must let us know so we can consider the effect of the change on your exempt status. Also, you must inform us of all changes in your name or address.

(L-178 (10-71)

If your gross receipts each year are normally more than \$5,000, you are required to file Form 990, Return of Organization Exempt From Income Tax, 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, for failure to file a return on time.

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. 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.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, a number will be assigned to you and you will be advised of it. Please use that purpose on all returns you file and in all correspondence with the Internal Revenue Service.

Mease keep this determination letter in your permanent records.

Sincerely yours.

F.S. Sebmidt

District Director