

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

Date:

FEB 28 2000

Employer Identification Number:

Form:

1120

Tax Years:

1998 and 1999

Contact Person:

ID Number:

Telephone Number:

Dear Applicant:

This letter constitutes a final adverse ruling with respect to your claim of exemption from federal income taxation under section 501(c)(6) of the Internal Revenue Code.

We make our ruling for the following reason(s):

We have concluded that since your primary activity is described as a regular business of a kind ordinarily carried on for profit, you are not described as a business league or chamber of commerce within the meaning of section 501(c)(6) of the Code. Accordingly, we hereby affirm our denial of your application for recognition of exemption from federal income tax under section 501(c)(6).

The Code and the regulations issued thereunder require that you file federal income tax returns. Based upon the financial information that you furnished, you should file returns on the form and for the tax years indicated above within 30 days from the date of this letter, unless you request and are granted an extension of time to file the returns. You should attach a copy of this letter to the returns you file. Questions concerning the filing of returns should be directed to the Ohio Tax Exempt and Government Entities (TE/GE) Customer Service office at 877-829-5500 (a toll free number).

If you have any questions concerning the reasons for this ruling, please contact the person whose name and telephone number appear in the heading of this letter.

Sincerely yours,

(signed) Garland A. Carter

Garland A. Carter
Manager, Exempt Organizations
Technical Group 2

cc:

T. ED. RA. T. 2

Garland A. Carter
2/28/00