

Form:  
1120  
Tax Years:  
All



CERTIFIED MAIL

JAN 23 1984

Dear Sir/Madam:

We have considered your application for exemption from Federal income tax as an organization described in Section 501(c)(2) of the Internal Revenue Code and the supporting information submitted.

You were incorporated [redacted] in [redacted] to oversee the operation and maintenance of [redacted], including without limitation, the administration of the golf professional services contract, the electric golf cart leasing contract and the snack bar operation.

Your activities are to operate the city-owned Golf Course Snack Bar as a food and beverage concession. Snack bar employees are paid by the City of [redacted]. The organization is required to pay to the city any and all net profits from the operation of the snack bar.

The organization operates the city owned snack bar pursuant to a lease agreement made [redacted] by and between the City of [redacted], Lessor, and [redacted], Lessee.

Your income is derived from sales of food and beverages.

Section 501(c)(2) of the Code exempts from tax; "Corporations organized for the exclusive purpose of holding title to property, collecting income therefrom, and turning over the entire amount thereof, less expenses, to an organization which is itself exempt under Section 501(a)."

There is no evidence which indicates your organization holds title to any property. Also, there is no organization which you turn over the required income to which is itself exempt under Section 501(a) of the Code.

Code	Initiator	Reviewer	Reviewer	Reviewer	Reviewer	Reviewer	Reviewer
	[redacted]	[redacted]					
Surname	[redacted]	[redacted]					
Date	1-13-84	1/23/84					

[REDACTED]

Since your organization is not organized for the exclusive title holding purposes set forth in Section 501(c)(2) and since you do not actually hold title, collect income, and turn this over to another exempt organization, you do not qualify for exemption under Section 501(c)(2).

Based on the information submitted, exempt status will not be recognized under any related paragraph of IRC 501(c).

You are required to file Federal income tax returns on the form and for the years shown above. File these returns with your key District Director for exempt organization matters within 60 days from the date of this letter, unless a request for an extension of time is granted. Filed returns for later tax years with the appropriate service center indicated in the instructions for those returns.

If you do not accept our findings, we recommend that you request a conference with a member of our Regional Office of Appeals. Your request for a conference should include a written appeal giving the facts, law, and any other information to support your position as explained in the enclosed Publication 892. You will then be contacted to arrange a date for a conference. The conference may be held at the Regional Office or, if you request, at any mutually convenient District Office. If we do not hear from you within 30 days of the date of this letter, this determination will become final.

Sincerely yours,

[REDACTED]  
District Director

Code	Initiator	Reviewer	Reviewer	Reviewer	Reviewer	Reviewer	Reviewer
Surname	[REDACTED]						
Date	1-13-84						