

ID-94-6140370



Internal Revenue Service

Washington, DC 20224

Date: **JAN 31 1972**

In reply refer to:
T:MS:EO:R:1

State Council of Cabrillo Civic
Clubs, Incorporated (f/k/a
Grand Council of Cabrillo
Civic Clubs)
1164 34th Avenue
Sacramento, California 95822

Gentlemen:

We have considered your application, dated October 18, 1971, requesting recognition of exemption for you and your subordinates under "new" section 501(c)(10) of the Internal Revenue Code.

Our records show, that under your former name Grand Council of Cabrillo Civic Clubs, you received an individual ruling letter dated June 30, 1936 recognizing you to be exempt from Federal income tax under section 101(9) of the Revenue Act of 1934, (this now corresponds to section 501(c)(7) of the Code).

Based on the information furnished we rule that you and your subordinate units, shown on the list submitted, are recognized as being exempt under "new" section 501(c)(10) of the Code effective January 1, 1970.

You are required to file the annual return, Form 990, on or before the 15th day of the 5th month after the end of your annual accounting period if your annual gross receipts are normally more than \$5,000. Failure to file the Form 990 by this date may subject you to a penalty of \$10 for each day during which such failure continues, up to a maximum of \$5,000. Your subordinates will have to file an annual information return, Form 990, if their gross receipts in each taxable year are normally more than \$5,000. If you do not include the subordinates in a group return, each must file an annual return by the 15th day of the 5th month after its annual accounting period closes.

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Incorporated (f/k/a Grand Council of
Cabrillo Civic Clubs)

You and your subordinates are not required to file Federal income tax returns unless you or your subordinates are subject to the tax on unrelated business income under section 511 of the Code, if so, you and your subordinates must file an income tax return on Form 990-T. In this letter we are not determining whether any of your, or your subordinates', present or proposed activities is unrelated trade or business as defined in section 513 of the Code.

Unless specifically excepted, you and your subordinate units are liable for taxes under the Federal Insurance Contributions Act (social security taxes). Also, unless excepted, you and your subordinate units are liable for tax under the Federal Unemployment Tax Act if, during the current or preceding calendar year, you have one or more employees at any time in each of 20 weeks, or your pay wages of \$1,500 or more in any calendar quarter. Any questions concerning excise, employment, or other Federal taxes should be submitted to your key District Director in San Francisco, California.

Effective January 1, 1970, contributions made to you or your subordinates are deductible by such donors as provided in section 170 of the Code, but only if to be used exclusively for the charitable purposes specified in section 170(c)(4) of the Code. Effective January 1, 1970, bequests, legacies, devises, transfers or gifts are deductible for Federal estate and gift tax purposes as provided in sections 2055, 2106, and 2522 of the Code, but only if to be used exclusively for the charitable purposes specified in sections 2055(a)(3), 2106(a)(2)(iii), and 2522(a)(3).

To the extent that this ruling is inconsistent with it, this ruling modifies our ruling issued to you on June 30, 1936.

You should advise each of the subordinates of the provisions of this ruling, including the requirement for filing information or other returns.

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of Cabrillo Civic Clubs)

Each year, within 45 days after your annual accounting period closes, please send us two copies of the following information about your subordinates:

1. A statement describing any changes during the year in the purposes, character, or method of operation of your subordinates.
2. A list of the names, mailing addresses including ZIP Codes, and employer identification numbers (if required for group exemption letter purposes) of subordinates on your group exemption roster that during the year:
 - a. changed names or addresses;
 - b. were deleted from the roster;
 - c. were added to the roster.

A directory of subordinates may be substituted for this list if it includes the required information and identifies the affected subordinates according to the three categories above.

3. For subordinates added to the roster, a letter signed by one of your principal officers containing or attaching:
 - a. a statement that the information which your present group exemption letter is based applies to the new subordinates;
 - b. a statement that each has given you written authorization to add its name to the roster;
 - c. a list of those to which the Service previously issued rulings or determination letters relating to exemption.

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4. If applicable, a statement that your group exemption roster did not change during the year.

Your key District Director is being advised of this action.

Sincerely yours,

Linder Hamblen

Director, Miscellaneous and
Special Provisions Tax Division