

**Internal Revenue Service
District Director**

Department of the Treasury

Date: JUN 20 1982

Our Letter Dated:
January 20, 1982
Advance Ruling Period Ends:
February 28, 1982
Person to Contact:
Irma Hill
Contact Telephone Number:
(213) 688-4889

▷ **World Service Office, Inc.**
10717 Sherman Way
Sun Valley, CA 91352

Gentlemen:

Our letter of the above date asked for information we needed to make a final determination of your private foundation status under section 509(a)(2) of the Internal Revenue Code.

Since we have not received the information, you are, under section 508(b) of the Code, presumed to be a private foundation as of the 91st day after the end of your advance ruling period, shown above. In addition, you are presumed to be a private foundation as of the first day of your first tax year for purposes of sections 507(d) and 4940 of the Code.

This presumption, however, is rebuttable. If you meet the requirements of section 509(a)(2), you may establish that fact by submitting a written request for a determination.

Your exempt status under section 501(c)(3) of the Code is still in effect.

Based on this presumption, you are required to file Form 990-PF, Return of Private Foundation Exempt from Income Tax, for the current and all subsequent years. Also, your foundation managers are required to file an annual report if you have at least \$5,000 of assets at any time during the tax year. (Form 990-AR, Annual Report of Private Foundation, may be used for this purpose.) The annual report, if required, and the Form 990-PF must be filed 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 each return or report filed late, unless there is reasonable cause for the delay.

Since you are presumed to be a private foundation as of the first day of your first tax year for purposes of sections 507(d) and 4940 of the Code, you are required to file a limited Form 990-PF for each year covered by your advance ruling. Complete only the general information at the top of the form, column (B) of Part I, Part II, and Part VII, and pay all taxes due, with interest as provided by law. If you file within 90 days from the date of this letter, you will not be subject to the penalty

(over)

P.O. Box 2350, Los Angeles, Calif. 90053

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provisions of sections 6651 and 6652. Attach a statement to the returns explaining that you have reasonable cause for filing late (your advance ruling) and cite Revenue Procedure ~~72-31, 1972-1C, B*759~~. The limited Forms 990-PF described in this paragraph should be filed with this office.

Because you are presumed to be a private foundation as of June 1, 1982, all parts of the Form 990-PF for FY 1981-82 should be completed. However, the figures for column (C) of Part I, Part VIII, Part IX, Part X, Part XI, and Part XII (if applicable), and your answers to the questions in Part V should reflect only the period beginning on the above date and ending on the last day of your tax year. Forms 990-PF for subsequent years should be completed and filed according to the instructions for those forms.

Since you have not provided the information needed to make a final 509(a)(2) determination of your private foundation status, it is considered by the Internal Revenue Service that you have not taken all reasonable steps to secure the 509(a)(2) determination you requested. Under section 7428(b)(2) of the Code, not taking all reasonable steps, in a timely manner, to secure the determination may be considered as a failure to exhaust administrative remedies available to you within the Service, and may preclude the issuance of a declaratory judgment in the matter under judicial proceedings.

Because this letter could help resolve any questions about your private foundation status, you should keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,

District Director

Enclosures:

Copy of our letter dated January 20, 1982 and attachment thereto.

** 79-8, 1979-1 C. B. 389