

Internal Revenue Service

Department of the Treasury

District
Director

Entered in POG

Person to Contact: EO:TPA

Telephone Number: 1-800-829-1040
312-435-1040

FAMILY RESEARCH INSTITUTE
111 KING STREET, SUITE 25
MADISON WISCONSIN 53693-3321

Refer Reply to: 95-0603

Date: December 23, 1994

RE: EXEMPT STATUS
EIN: 39-1556433

This is in response to the letter, dated December 9, 1994, regarding your status as an organization exempt from Federal income tax.

Our records indicate that a ruling letter was issued in August 1986, granting your organization an exemption from Federal income tax under the provisions of Section 501(c)(3) of the Internal Revenue Code of 1954. Our records also indicate that your organization is not a private foundation but one that is described in Section 509(a)(1) & 170(b)(1)(A)(vi) of the Internal Revenue Code.

Contributions made to you are deductible by donors in computing their taxable income in the manner and to the extent provided in Section 170 of the Internal Revenue Code.

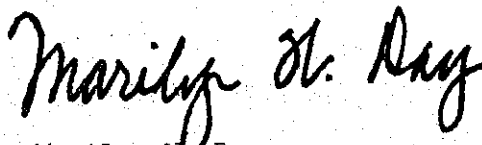
If your gross receipts each year are normally \$25,000 or more, you are required to file Form 990, Return of Organizations Exempt from Income tax by the fifteenth day of the fifth month after the end of your annual accounting period.

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 F-990-T.

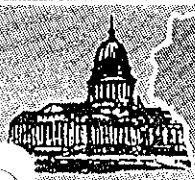
If any questions arises with respect to your status for Federal income tax purposes, you may use this letter as evidence of your exemption.

This is an advisory letter.

Sincerely yours,



Marilyn W. Day
District Director



FAMILY RESEARCH INSTITUTE

111 King Street, Suite 25 • Madison, WI 53703-3339 • (608) 256-3228

December 9, 1994

Internal Revenue Service
District Director
PO Box A-3290
Chicago, IL 60690

Dear Sirs:

Our employer identification number is 36-1556433. Enclosed is a copy of our original letter stating tax exempt status under Code Section 501(c)(3) when originally granted August 19, 1986.

The name of the organization has been changed from Christian Research Institute of Wisconsin Inc to Family Research Institute of Wisconsin Inc. Our address has also changed. Enclosed is a copy of the nonstock, nonprofit corporation amendment that was filed with the state of Wisconsin for this name change.

We would like an updated letter with the new name and address for our permanent records. Your help in this matter will be greatly appreciated. Thank you.

Sincerely,

Marvin L Munyon
President

Internal Revenue Service
District Director
P O BOX A-3290 DPN 22-2
CHICAGO, IL 60690

Department of the Treasury

Date: SEP 02 1988

Employer Identification Number:
36-1556433

Contact Person:
MRS. Y. RILEY

Contact Telephone Number:
(312) 886-7731

CHRISTIAN RESEARCH INSTITUTE OF
WISCONSIN INC
PO BOX 137
WATERTOWN, WI 53094-7237

Our Letter Dated:
Aug. 19, 1986
Caveat Applies:
No

Dear Applicant

This modifies our letter of the above date in which we stated that you would be treated as an organization which is not a private foundation until the expiration of your advance ruling period.

Based on the information you submitted, we have determined that you are not a private foundation within the meaning of section 509(a) of the Internal Revenue Code because you are an organization of the type described in section 509(a)(1) and 170(b)(1)(A)(vi). Your exempt status under Code section 501(c)(3) is still in effect.

Grantors and contributors may rely on this determination until the Internal Revenue Service publishes notice to the contrary. However, if you lose your section 509(a)(1) status, a grantor or contributor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act that resulted in your loss of such status, or acquired knowledge that the Internal Revenue Service had given notice that you would be removed from classification as a section 509(a)(1) organization.

If the heading of this letter indicates that a caveat applies, the caveat below or on the enclosure is an integral part of this letter.

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

Letter 1050 (DO/CG)

CHRISTIAN RESEARCH INSTITUTE OF

If you have any questions, please contact the person whose name and telephone number are shown above.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "R. S. Wintrobe, Jr.", with a stylized flourish at the end.

R. S. Wintrobe, Jr.
District Director

Internal Revenue Service
District Director

Department of the Treasury

Date: 19 AUG 1986

Employer Identification Number: 39-1556433

Accounting Period Ending: April 30th

Foundation Status Classification: 509(a)(1) and 170(b)(1)(A)(vi)

Advance Ruling Period Ends: April 30, 1988

Person to Contact: A. Barrett

Contact Telephone Number: (312) 886-1278

THE CHRISTIAN RESEARCH INSTITUTE OF
WISCONSIN, INC.
PO BOX 137
WATERTOWN, WI 530947237

Dear Applicant:

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 Federal income tax under section 501(c)(3) of the Internal Revenue Code.

Because you are a newly created organization, we are not now making a final determination of your foundation status under section 509(a) of the Code. However, we have determined that you can reasonably be expected to be a publicly supported organization described in section 509(a)(1) and 170(b)(1)(A)(vi).

Accordingly, you will be treated as a publicly supported organization, and not as a private foundation, during an advance ruling period. This advance ruling period begins on the date of your inception and ends on the date shown above.

Within 90 days after the end of your advance ruling period, you must submit to us information needed to determine whether you have met the requirements of the applicable support test during the advance ruling period. If you establish that you have been a publicly supported organization, you will be classified as a section 509(a)(1) or 509(a)(2) organization as long as you continue to meet the requirements of the applicable support test. If you do not meet the public support requirements during the advance ruling period, you will be classified as a private foundation for future periods. Also, if you are classified as a private foundation, you will be treated as a private foundation from the date of your inception for purposes of sections 507(d) and 4940.

Grantors and donors may rely on the determination that you are not a private foundation until 90 days after the end of your advance ruling period. If you submit the required information within the 90 days, grantors and donors may continue to rely on the advance determination until the Service makes a final determination of your foundation status. However, if notice that you will no longer be treated as a section 509(a)(1) organization is published in the Internal Revenue Bulletin, grantors and donors may not rely on this determination after the date of such publication. Also, a grantor or donor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act that resulted in your loss of section 509(a)(1) status, or acquired knowledge that the Internal Revenue Service had given notice that you would be removed from classification as a section 509(a)(1) organization.

(over)

If your sources of support, or your purposes, character, or method of operation change, please let us know so we can consider the effect of the change on your exempt status and foundation status. Also, you should inform us of all changes in your name or address.

As of January 1, 1984, you are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$100 or more you pay to each of your employees during a calendar year. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Organizations that are not private foundations are not subject to the excise taxes under Chapter 42 of the Code. However, you are not automatically exempt from other Federal excise taxes. If you have any questions about excise, employment, or other Federal taxes, please let us know.

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 if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

You are required to file Form 990, Return of Organization Exempt from Income Tax, only if your gross receipts each year are normally more than \$25,000. If a return is required, it 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, when a return is filed late, unless there is reasonable cause for the delay.

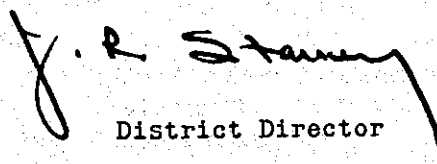
You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T, Exempt Organization Business Income Tax Return. In this letter, we are 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 number on all returns you file and in all correspondence with the Internal Revenue Service.

Because this letter could help resolve any questions about your exempt status and 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