

TREASURY DEPARTMENT

WASHINGTON 25

OFFICE OF
COMMISSIONER OF INTERNAL REVENUEADDRESS REPLY TO
COMMISSIONER OF INTERNAL REVENUE
AND REFER TOIT:P:T:1
RD.Callaway Community Foundation
No. 1 Dallas Street
LaGrange, Georgia

Gentlemen:

RECEIVED
TREASURER'S OFFICE
JAN 22 1945
ANSWERED

JAN 20 1945

It is the opinion of this office, based upon the evidence presented, that you are exempt from Federal income tax under the provisions of section 101(6) of the Internal Revenue Code and corresponding provisions of prior revenue acts, as it is shown that you are organized and operated exclusively for religious, charitable and educational purposes.

Accordingly, you will not be required to file income tax returns unless you change the character of your organization, the purposes for which you were organized, or your method of operation. Any such changes should be reported immediately to the collector of internal revenue for your district in order that their effect upon your exempt status may be determined.

Since any organization which is exempt from Federal income tax under the provisions of section 101 of the Internal Revenue Code also is exempt from the capital stock tax pursuant to the express provisions of section 1201(a)(1) of the Internal Revenue Code, you will not be required to file capital stock tax returns for future years so long as the exemption from income tax is effective.

Furthermore, under substantially identical authority contained in sections 1426 and 1607 of the Code and/or corresponding provisions of the Social Security Act, the employment taxes imposed by such statutes are not applicable to remuneration for services performed in your employ so long as you meet the conditions prescribed above for retention of an exempt status for income tax purposes.

You will be required, however, to file annually, beginning with your current accounting period, an information return on Form 990 with the collector of internal revenue for your district so long as this exemption remains in effect. This form may be obtained from the collector and is required to be filed on or before the 15th day of the fifth month following the close of your annual accounting period.

Callaway Community Foundation.

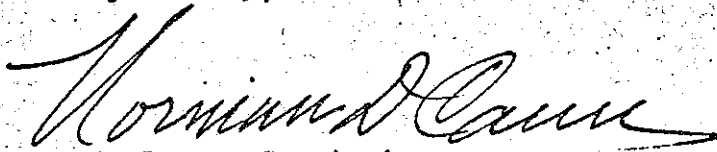
Contributions made to you are deductible by the donors in arriving at their taxable net income in the manner and to the extent provided by section 23(o) and (q) of the Internal Revenue Code, as amended, and corresponding provisions of prior revenue acts.

Bequests, legacies, devises or transfers, to or for your use are deductible in arriving at the value of the net estate of a decedent for estate tax purposes in the manner and to the extent provided by sections 812(d) and 861(a)(3) of the Code and/or corresponding provisions of prior revenue acts. Gifts of property to you are deductible in computing net gifts for gift tax purposes in the manner and to the extent provided in section 1004(a)(2)(B) and 1004(b)(2) and (3) of the Code and/or corresponding provisions of prior revenue acts.

The collector of internal revenue for your district is being advised of this action.

By direction of the Commissioner.

Respectfully,


Deputy Commissioner.

EXEMPTION AFFIDAVIT

FOR USE OF RELIGIOUS, CHARITABLE, SCIENTIFIC, LITERARY, OR EDUCATIONAL ORGANIZATIONS

CLAIMING EXEMPTION FROM FEDERAL INCOME TAX UNDER SECTION 101(6) OF THE INTERNAL REVENUE CODE AND THE
CORRESPONDING PROVISIONS OF PRIOR REVENUE ACTS

(To be made only by a principal officer of the organization claiming the exemption)

(Organizations claiming exemption under section 101(6), except exclusively religious organizations, should file Form
990 with this affidavit)

STATE OF Georgia }
COUNTY OF Troup } SS.

J. K. Boatwright

(Name of person making affidavit)

deposes and says that he is the

Treasurer

(Title of affiant—as president, secretary, etc.)

of the

Callaway Community Foundation

(Full name of organization)

located at

No. 1 Dallis St., LaGrange, Ga.

(Complete address, including street and number—post office box, etc.)

and that the following answers and statements, including all statements attached hereto, are complete
and true to the best of his knowledge and belief:

1. Is the organization incorporated? Yes If so, under the laws of what State? Georgia
(Yes or no) (Name of State)

When? 10-11-43 If not incorporated, state the manner of organization and the date thereof
(Date of incorporation)

2. Is the organization the outgrowth or continuation of any form of predecessor? No If so, state the
(Yes or no)
name of such predecessor and the period during which it was in existence

3. Has the organization filed Federal income tax returns? No If so, for what year or years?
(Yes or no)

4. State briefly the specific purposes for which the organization was formed. (Do not quote from, or make
reference to, the articles of incorporation or bylaws for this purpose.) Religious, Charitable, and
Educational

5. Is the organization authorized to issue capital stock? **No** (Yes or no) If so, state (1) the class or classes of such stock, (2) the number and par value of shares of each class outstanding, and (3) the consideration paid for outstanding shares _____

6. If capital stock is outstanding, state whether any dividends or interest has been or may be paid thereon _____ If so, give facts in detail (Yes or no) _____

7. If any distribution of corporate property of any character has ever been made to shareholders or members, attach hereto a separate statement containing full details thereof, including (1) amounts or value, (2) source of funds or property distributed, and (3) basis of and authority for distribution.

8. State all sources from which the organization's income is derived _____

Contributions and Investments

9. Does any part of the receipts represent payment for services of any character rendered by the organization?

No (Yes or no) If so, explain in detail _____

10. State all the activities in which the organization is presently engaged. (Explain in detail, using additional sheets as required—See footnote.) **Assist in support of religious institutions by making monthly donations to churches.**

11. What, if any, specific activities of the organization have been discontinued? (Explain fully, giving dates of commencement and termination and the reason for discontinuance.) **None**

12. Is the organization now, or has it ever been, engaged in carrying on propaganda, or otherwise either advocating or opposing pending or proposed legislation? No If so, furnish a detailed explanation of such activities, (Yes or no) and furnish copies of literature, if any, distributed by the organization. (Use additional sheets as required—See footnote.)

13. (a) For what purposes, other than in payment for services rendered or supplies furnished, are the organization's funds expended? None

(b) If any payments are made to members or shareholders for services rendered the organization, attach a separate statement showing the amounts so paid and the character of the services rendered.

14. Does any part of the net income of the organization inure to the benefit of any private shareholder or individual? No

15. If the organization is a hospital, attach a separate statement showing the number of full-pay, the number of part-pay, and the number of nonpay patients treated during the last complete year of operation.

16. In the event of the dissolution of the organization, what disposition would be made of its property?

As outlined in paragraph 9 of the Charter

17. Attach to this affidavit a classified statement of the receipts and expenditures of the organization during the last complete year of operation and a complete statement of the assets and liabilities as of the end of that year; a copy of the articles of incorporation, if incorporated, or if not incorporated, a copy of the constitution, articles of association, declaration of trust, or other document setting forth the aims and purposes of the organization; and a copy of the bylaws, or other similar code of regulations.

(If the space provided for the insertion of information or data under any of the above questions is inadequate for the purposes, additional sheets may be used which should be properly identified and securely attached hereto.)

A mere claim or contention by an organization that it is exempt from income tax under section 101 of the Internal Revenue Code and the corresponding provisions of prior revenue acts will not relieve the organization from filing income tax returns and paying the tax. Unless the Commissioner has determined that an organization is exempt, it must prepare and file a complete income tax return for each taxable year of its existence. Accordingly, every organization that claims to be exempt should furnish the information and data specified herein, together with any other facts deemed material to the question, with the least possible delay, in order that the Commissioner can determine whether or not it is exempt. As soon as practicable after the information and data are received, the organization will be advised of the Commissioner's determination, and, if it is held to be exempt, no further returns of income will be required.

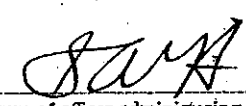


(Signature of officer making affidavit)

Treas

Subscribed and sworn to before me this 6th day of April, 1944

[NOTARY'S SEAL]



(Signature of officer administering oath)

~~Treasurer~~

(Title)

(This affidavit may be executed without cost before any Internal Revenue officer authorized to administer oaths.)