

Internal Revenue Service
District Director

Department of the Treasury

Date: May 31, 1985

Our Letter Dated:
March 28, 1983
Person to Contact:
R. D. Morris
Contact Telephone Number:
488-3100

▷ International Life Sciences Institute
1126 16th Street, N.W., Suite 111
Washington, D.C. 20036

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.

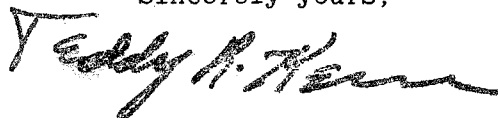
Based on the information you submitted, we have determined that you are not a private foundation within the meaning of section 509(a) of the Internal Revenue Code, because you are an organization of the type described in section ** see below. Your exempt status under section 501(c)(3) of the code is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

Grantors and contributors may rely on this determination until the Internal Revenue Service publishes notice to the contrary. However, a grantor or a 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 section ** see below status, or acquired knowledge that the Internal Revenue Service had given notice that you would be removed from classification as a section ** see below organization.

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

If you have any questions, please contact the person whose name and telephone number are shown above.
**509(a)(1)&170(b)(1)(A)(vi).

Sincerely yours,



Teddy R. Kern
District Director

cc: (FOA) Roger D. Middlekauff
McKenna, Commer & Cuneo
1575 Eye Street, N.W.
Washington, D.C. 20005

Internal Revenue Service

Department of the Treasury

Washington, DC 20224

International Life Sciences
Institute
900 17th St., N.W., Suite 600
Washington, DC 20006

Person to Contact:
James Fillmore
Telephone Number:
(202) 566-3844
Refer Reply to:
OP:E:EO:T:R:3-RHD
Date:

28 MAR 1983

Employer Identification Number: 52-1131788
Key District: Baltimore, MD
Accounting Period Ending: December 31
Foundation Status Classification: 509(a)(2)
Advance Ruling Period Ends: December 31, 1984

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. Your exemption is effective as of February 17, 1982, the date you amended your Articles of Organization to conform them to the requirements of section 501(c)(3).

Since you do not yet have a history of financial operations as an organization exempt under section 501(c)(3), we are not now making a final determination of your foundation status under section 509(a). However, we have determined that you can reasonably be expected to be a publicly supported organization described in section 509(a)(2) of the Code.

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 February 17, 1983, and ends on the date shown above.

Within 90 days after your advance ruling period ends, furnish your key District Director 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 such from the date you became exempt under section 501(c)(3) for purposes of sections 507(d) and 4940.

International Life Sciences
Institute

Grantors and donors may rely on the determination that you are not a private foundation until 90 days after your advance ruling period ends. If you submit the required information within the 90 days, grantors and donors may continue to rely on the advance determination until we make a final determination of your foundation status. However, if notice that you will no longer be treated as a section 509(a)(2) organization is published in the Internal Revenue Bulletin, grantors and donors may not rely on this advance 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)(2) status, or acquired knowledge that we had given notice that you would be removed from classification as a section 509(a)(2) organization.

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

Generally, you are not required to pay social security (FICA) taxes unless you file a certificate electing coverage as provided in the Federal Insurance Contributions Act. If you have paid FICA taxes without filing the certificate, you should contact your key District Director. You are not required to pay tax 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 questions about excise, employment, or other federal taxes, contact any Internal Revenue Service office.

Donors may deduct contributions to you made after February 16, 1983, as provided in Code section 170. Bequests, legacies, devises, transfers, or gifts to you or for your use made after February 16, 1983, are deductible for federal estate and gift tax purposes if they meet the applicable provisions of section 2055, 2106, and 2522.

International Life Sciences
Institute

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 \$10,000. 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. For tax years ending on and after December 31, 1982, organizations whose gross receipts are not normally more than \$25,000 are excused from filing Form 990. For guidance in determining if your gross receipts are "normally" not more than the \$25,000 limit, see the instructions for the 1982 Form 990.

You are not required to file federal income tax returns unless you are subject to the tax on unrelated business income under section 511. 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.

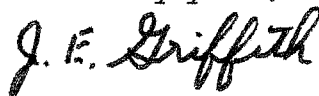
Please show your employer identification number on all returns you file and in all correspondence with the Internal Revenue Service.

We are informing your key District Director of this ruling. 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 about this ruling, please contact the person whose name and telephone number are shown in the heading of this letter. For other matters, including questions concerning reporting requirements, please contact your key District Director.

This ruling supersedes our letter of December 19, 1978, holding you to be exempt from federal income tax under section 501(c)(6) of the Code.

Sincerely yours,



J. E. Griffith
Chief, Rulings Section
Exempt Organizations
Technical Branch