

MAR 24 1973
Department of the Treasury

Internal Revenue Service
Washington, DC 20224

Date: **FEB 28 1973** In reply refer to:
T:MS:EO:R:2



DO 95

Santa Catalina Island
Conservancy
P.O. Box 1086
San Pedro, California 90733

Gentlemen:

Based on information supplied, and assuming your operation 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.

We have further determined that you are a private foundation as defined in section 509(a) of the Code and that you are an operating foundation as defined in section 4942(j)(3) of the Code.

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.

If your purposes, character, or method of operation is changed, you must let your key District Director, Los Angeles, California, know so he can consider the effect of the change on your exempt status. Also, you must inform him of all changes in your name or address.

You are required to file Form 990 only if your gross receipts each year are normally more than \$5,000. 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, for failure to file the return on time.

Re: Santa Catalina Island Conservancy

You are not liable for social security (FICA) taxes unless you file a waiver of exemption certificate as provided in the Federal Insurance Contributions Act. You are not liable for the taxes imposed under the Federal Unemployment Tax Act (FUTA).

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. 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.

We are informing your key District Director of this action. Please keep this ruling letter in your permanent records.

Sincerely yours,

Milton Cerny

Chief, Rulings Section
Exempt Organizations Branch