

Department of the Treasury

District Director

Internal Revenue Service

Date:

October 28, 1969

In reply refer to:

434-TMH



- ▷ Reverend Robert E. H. Peeples, President
The Lawton Family Foundation, Inc.
Route 2, Box 28
Hilton Head Island, S. C. 29928

Dear Mr. Lawton:

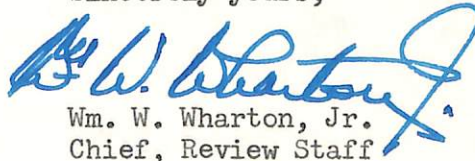
This is in reply to your letter dated October 28, 1969, in which you ask for a formal ruling that contributions to the Lawton Family Foundation, Inc., are deductible by the donors for Federal income tax purposes.

In order to issue the ruling which you request, it will first be necessary that we establish that the Foundation is entitled to exemption as an organization described in section 501(c)(3) of the Internal Revenue Code. Accordingly, we enclose a supply of exemption applications, Form 1023, together with our Publication 557, entitled "How to Apply for Exemption for an Organization." The exemption application and all of the documents and statements called for by Item 10 of the application form must be submitted in duplicate.

You explain in your letter that your organization is educational in nature. We believe that you will find the discussion on page 12 of Publication 557 helpful in understanding what is required of exempt educational organizations. The name of your foundation implies a private activity while an exempt educational organization must be a public activity; that is, that the subjects be useful to individuals and beneficial to the community. Therefore, your application should explain in detail how the activities of your organization will be useful to the community.

Upon receipt of a complete application for exemption, further consideration will be given to your request.

Sincerely yours,


Wm. W. Wharton, Jr.
Chief, Review Staff