

INTERNAL REVENUE SERVICE
DISTRICT DIRECTOR
P. O. BOX 2508
CINCINNATI, OH 45201

Dear Applicant :
DEPARTMENT OF THE TREASURY

Date :

JUN 2 4 1997

KOOTENAI VALLEY CHRISTIAN
SCHOOL
INC .
C/O MICHAEL D. RAY
PO BOX 114
LIBBY/ MT 59923

Employer Identification

Number : 81-0510370 DI-IN :
17053007049007

Contact Person :

EO CUSTOMER SERVICE

Contact Telephone Number :

(213) 894-2289

Accounting Period Ending :

August 31

Form 990 Required:

Yes

Addendum Appendices :

Yes

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 (a) of the Internal Revenue Code as an organization described in section 501 (c) (3) .

We have further determined that you are not a private foundation within the meaning of section 509 (a) of the Code, because you are an organization described in sections 509 (a) (I) and 170 (b) (1) (A) (i) .

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 . In the case of an amendment to your organizational document or bylaws, please send us a copy of the amended document or bylaws. Also, you should inform us of all changes in your name or address .

Since you are not a private foundation, you 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 Code sections 2055, 2106, and 2522.

Contribution deductions are allowable to donors only to the extent that their contributions are gifts, with no consideration received. Ticket purchases and similar payments in conjunction with fundraising events may not necessarily qualify as deductible contributions, depending on the circumstances . See Revenue Ruling 67-246, published in Cumulative Bulletin 1967-2, on page 104, which sets forth guidelines regarding the deductibility,
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as charitable contributions, of payments made by taxpayers for admission to or other participation in fundraising activities for charity.

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In the heading of this letter we have indicated whether you must file Form 990, Return of Organization Exempt From Income Tax. If Yes is indicated, you are required to file Form 990 only if your gross receipts each year are normally more than \$25, 000. However, if you receive a Form 990 package in the mail, please file the return even if you do not exceed the gross receipts test . If you are not required to file, simply attach the label provided, check the box in the heading to indicate that your annual gross receipts are normally \$25, 000 or less, and sign the return.

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. A penalty of \$10 a day is charged when a return is filed late, unless there is reasonable cause for the delay. However, the maximum penalty charged cannot exceed \$5, 000 or 5 percent of your gross receipts for the year, whichever is less. This penalty may also be charged if a return is not complete, so please be sure your return is complete before you file it.

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 .

Revenue Procedure 75-50, published in Cumulative Bulletin 1975-2 on page 587, sets forth guidelines and recordkeeping requirements for determining whether private schoolg have racially nondiscriminatory policies as to students. You must comply with this revenue procedure to maintain your

tax-exempt status .

This determination is based on evidence that your funds are dedicated to the purposes listed in section 501 (c) (3) of the Code. To assure your continued exemption, you should keep records to show that funds are expended only for those purposes . If you distribute funds to other organizations, your records

should show whether they are exempt under section 501 (c) (3) . In cases where the recipient organization is not exempt under section 501 (c) (3) , there should be evidence that the funds will remain dedicated to the required purposes and that they will be used for those purposes by the recipient .

If distributions are made to individuals, case histories regarding the recipients should be kept showing names, addresses, purposes of awards, manner of selection, relationship (if any) to members, officers, trustees or donors of funds to you, so that any and all distributions made to individuals can be

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substantiated upon request by the Internal Revenue Service . (Revenue Ruling 56-304, C.B. 1956-2, page 306.)

If we have indicated in the heading of this letter that an addendum applies, the enclosed addendum is an integral part of this letter .

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