

Internal Revenue Service
District Director

Department of the Treasury

RECEIVED

Date: SEP 8 1980

Employer Identification Number:

SEP 9 1980

Person to Contact:
Marilyn Miller

Contact Telephone Number:
(513) 684-3866

▷ Paul Ogle Foundation, Inc.
323 E. Court Ave - P. O. Box 946
Jeffersonville, IN 47130

FIFER, YOGT, & LANUM

CIN: EO: '801992

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.

We have further determined that, as indicated in your application, you are a private foundation within the meaning of section 509(a) of the Code. In this letter, we are not determining whether you are an operating foundation as defined in section 4942(j)(3).

If 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. Also, you should inform us of all changes in your name or address.

Generally, 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. If you have paid FICA taxes without filing the waiver, you should call us. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA). However, since you are a private foundation, you are subject to excise taxes under Chapter 42 of the Code. You also may be subject to 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 sections 2055, 2106, and 2522 of the Code.

You are required to file Form 990-PF, Return of Private Foundation Exempt from Income Tax. Also, your foundation managers are required to file an annual report if you have at least \$5,000 of assets at any time during the tax year. (Form 990-AR, Annual Report of Private Foundation, may be used for this purpose.) The annual report, if required, and the Form 990-PF must be filed by the 15th day of the fifth month after the end of your annual accounting period. The law imposes a penalty

(see attached)

P.O. Box 2508, Cincinnati, Ohio 45201

Letter 1076(DO) (6-77)

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of \$10 a day, up to a maximum of \$5,000, for each return or report filed late, unless there is reasonable cause for the delay.

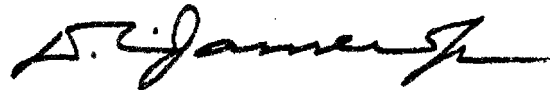
You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T. In this letter, we are not determining whether any of your present or 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.

Because this letter could help resolve any questions about your exempt status and private 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,

A handwritten signature in cursive script, appearing to read "D. James".

District Director

Paul Ogle Foundation, Inc.

1. This ruling is based on evidence that your funds are dedicated to the purposes set out in section 501(c)(3) of the Code. To assure your continued exemption, you should maintain 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 positive evidence that the funds remain dedicated to the required purposes and that they will be used for those purposes by the recipient.
2. After you have formulated the plans for your scholarship program and before you actually begin to make distributions for scholarships, you must receive advance approval of your grant making procedures under section 4945(g) of the Code. The request for approval should thoroughly describe your scholarship program. The request should be submitted to our office at the above address.