Internal Revenue Service

Department of the Treasury

Washington, DC 20224

SIN: 507.00-00

Contact Person: 199913034

Telephone Number:

In Reference to: OP:E:EO:T:3

Date: DEC 22

Legend:

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Dear Sir or Madam:

This is in response to a letter dated October 8, 1998, from your legal representative regarding a change you would like us to make to one of the rulings contained in a private letter ruling we issued to you on March 12, 1998.

Specifically, the current ruling No. 1 reads as follows: "If you terminate your status as a private foundation pursuant to section 507(a)(1) of the Code, and the requirements set forth in section 507(g)(2) are met, the Service will abate the tax imposed by section 507(c)." You request that the phrase "and the requirements set forth in section 507(g)(2) are met" be deleted.

Shortly after the letter of March 12, 1998 was issued, you spoke to us regarding this change. We requested that you provide the Service with a letter from the Attorney General of X describing relevant X law. Thus, you have attached such a letter from the Attorney General of X. The letter indicates that, as required by section 507(g)(2) of the Code, there are mechanisms under X law sufficient to assure implementation of the provisions of Chapter 42 of the Code and insure that the assets of a private foundation are preserved for charitable purposes.

With respect to the above, we amend our ruling No. 1 to state, "If you terminate your status as a private foundation pursuant to section 507(a)(1) of the Code, the Service will abate the tax imposed by section 507(c)."

Please attach this amendment to your letter dated March 12, 1998.

This ruling letter is directed only to the organization that requested it. Section 6110(j)(3) of the Code provides that it may not be used or cited as precedent.

Sincerely yours,

Kenneth J. Earnest

Kenneth J. Earnest
Acting Chief,
Exempt Organizations
Technical Branch 3