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Private Operating Foundation Status Provisions

Location of Required Special Provisions

For

Private Operating Foundation Status Designation

Special provisions are required by Internal Revenue Code 501(c) (3) and 508(e) to avoid liability for excise taxes under sections 4941(d), 4942, 4943(c), 4944, and 4945(d).

These provisions can be found in the Organization's Articles of Incorporation, specifically in IRS 1023 Attachment 2, Page 1, Article 3, Paragraph 1 and 2, and in IRS 1023 Attachment 2, Page 1, Article 5, Paragraph 1, 2, and 3 and sub-paragraphs 3a and 3b, and IRS 1023 Attachment 2, Page 2, Article 6, Paragraphs 1 and 2, respectively.