

APR 07 1997

Internal Revenue Service
District Director

Department of the Treasury

P. O. Box 2508
Cincinnati, OH 45201

Date: APR 3 1997

Person to Contact:
Ruth Ohmer

COPY

Louisville Presbyterian
Theological Seminary
1044 Alta Vista Rd.
Louisville, KY 40205-1758

Telephone Number:
513-241-5199
Fax Number
513-684-5936
Federal Identification Number
61-0444768

Dear Sir or Madam:

This is in response to your request for a letter affirming your organization's exempt status.

In January 1943, we issued a determination letter that recognized your organization as exempt from federal income tax under section 101(6) of the Internal Revenue Code of 1939 (now section 501(c)(3) of the Internal Revenue Code). Your organization is classified as a publicly supported organization, and not a private foundation, because it is described in sections 509(a)(1) and 170(b)(1)(A)(i) of the Code. Donors may deduct contributions to your organization as provided in section 170 of the Code. That letter is still in effect.

As of January 1, 1984, your organization is liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remunerations of \$100 or more paid to each of its employees during a calendar year. Your organization is not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

If your organization is a church or a qualified church-controlled organization as defined in section 3121(w)(3) of the Code, it may elect to exclude the wages paid to its employees (other than for services performed in an unrelated trade or business) for social security taxes. This election must be made by filing Form 8274 by the day before the date the organization's first quarterly employment tax return would be due under the revised law. If your organization makes this election, its employees who earn \$100 or more during a calendar year become liable for the payment of self-employment tax (under section 1402 of the Code) on the wages the organization pays them.

Organizations that are not private foundations are not subject to the excise taxes under Chapter 42 of the Code. However, these organizations are not automatically exempt from other Federal excise taxes.

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Donors may deduct contributions to your organization as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to your organization or for its 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.

Your organization is not required to file federal income tax returns unless it is subject to the tax on unrelated business income under section 511 of the Code. If your organization is subject to this tax, it must file an income tax return on Form 990-T, Exempt Organization Business Income Tax Return.

As this letter could help resolve any questions about your organization's exempt and foundation status, you should keep it with the organization's permanent records.

If you have any questions, you may contact us at the address or telephone number shown in the heading of this letter.

This letter affirms your organization's exempt status.

Sincerely,

A handwritten signature in dark ink, appearing to read "C. Ashley Bullard". The signature is written in a cursive style with some loops and flourishes.

C. Ashley Bullard
District Director