



HISTORIC
FRANKLIN
TENNESSEE

ITEM #4
WRKS
02/25/14

MEMORANDUM

February 18, 2014

TO: Board of Mayor and Aldermen

FROM: Eric Stuckey, City Administrator
Special Events Advisory Team

SUBJECT: Franklin First's Fiddlin' Fish 5K/1 Mile Run (May 10, 2014)

Purpose

The purpose of this memo is to outline recommendations for the Franklin First's Fiddlin' Fish 5K/1 Mile Run sponsored by Franklin First United Methodist Church.

Background

This is an annual event coordinated by Franklin First United Methodist Church.

Recommendation

Staff recommends approval with the following conditions:

- Applicant will provide updated Good Neighbor Letter which will be distributed to area residents within the approved course.
- Applicant will provide a \$1,000 refundable damage deposit to City prior to event.

Risk Management:

- Applicant will provide certificate of insurance naming the City as additional insured.

Police Department:

- Applicant will hire nine (9) extra-duty Franklin Police Officers to secure the course provide security and traffic control.
- Applicant will provide at least a 72-hour advance notice to CSX.

Sanitation and Environmental Services Department:

- Applicant will provide volunteers to pick-up any trash associated with the event.

OFFICE USE ONLY:
Permit No: _____



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FRANKLIN
TENNESSEE

CITY OF FRANKLIN EVENT PERMIT APPLICATION

*Application is Due 90 Days Prior to Scheduled Event.
Please read application carefully and fully complete each section.
A non-refundable application fee of \$100 is due at time of filing.*

Note: Filing this application does not guarantee that your request will be granted.

- Please check all that apply:
- | | |
|--|--|
| <input checked="" type="checkbox"/> street closure | <input type="checkbox"/> parade |
| <input type="checkbox"/> other special event | <input type="checkbox"/> beer served (<i>separate permit required</i>) |

Please supply the following information. For additional space, use separate sheets of paper and attach to the application.

1) Location requested (if Temporary Street Closure only, list major roads to be closed):

- | | | |
|----------------------|----------------------|---|
| ___ Aspen Grove Park | ___ Liberty Park | ___ Eastern Flank Battlefield Park |
| ___ Fieldstone Farms | ___ Pinkerton Park | |
| ___ Jim Warren Park | ___ Harlinsdale Farm | Other: <u>5th Ave First United Methodist</u>
<u>to Carnton Plantation via Lewisburg</u> |

2) Name/purpose of event: Fiddlin' Fish 5K

3) Date or dates of event: May 10, 2014

4) Time of Event: 7:00 AM

5) Time of Street Closure (if applicable): 7:30 - 8:45

Set-Up Date/Time: _____ Tear-down Date/Time: _____

*Note: Two (2) hours will be added before set-up time and two hours (2) will be added after tear-down to allow time for clean-up. Event is responsible for payment of Franklin Police Officers during this time. Read Additional Requirements section for more information.

6) Name of Applicant and Organization Requesting Permit:

Mike Gill / First United Methodist

a) Address: 143 5th Ave.

b) Phone: 969-5356 c) Cell: _____ d) Fax: _____

e) E-mail address: gillmc@bellsouth.net

7) Person in charge on day of event: Mike Gill

Cell: 969-5356 E-mail address: gillmc@bellsouth.net



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TENNESSEE

- 8) Name and Cell Number of at least two others available on day of event:

Name: Chad Gore Cell: 310-0404 E-mail address: cegoreh@yahoo.com

Name: Christine Gill Cell: 969-5364 E-mail address: gillmc@bellsouth.net

- 9) DETAILED description of event (use additional sheets):

5K to raise money for families who have children
requiring an extended stay at a hospital.

- 10) **ENCLOSE A DETAILED MAP** of event site, detailing any temporary or permanent structures, street closures, parking, etc. If applicable, list the location, blocks, streets, and/or intersections in which such event will occur. *For large-scale events, map should be obtained from the City's GIS division.*

- 11) An estimated number of participants and an estimated number of attendees expected to attend during the course of the event:

400

- 12) Please **attach a list** containing the names, addresses, and phone numbers of the Chairperson of the organization and all other persons involved in the management or control of organization and/or committee.

- 13) Is your organization based in Williamson County? Circle Yes or No
(if no, please state where: _____)

- 14) Is your organization authorized to do business in Tennessee? Circle Yes or No

- 15) Is your organization a tax-exempt organization as described by the Internal Revenue Code Section 501(c)(3) or a not-for-profit organization? Circle Yes or No. If yes, please attach copy of IRS tax exemption letter providing proof of status.

- 16) Will you charge an admission/participation fee (including vendors)? If yes, please specify how much per person/vendor. \$25 per runner

- 17) Will any charity, gratuity, or offers be solicited or accepted during the event? Circle Yes or No.

- 18) Is this event a fundraiser? Circle Yes or No. If yes, what organization will be benefactor of event? What percentage of funds will they receive? Mission of Church

- 19) Will parking in the area of the event need to be restricted or prohibited? Circle Yes or No



- 20) Will any sound amplification equipment be used during the event? Circle Yes or No. If no, please skip to Question #22.
- 21) For what purpose will sound amplification be used (i.e. announcements, entertainment, etc.)?
Announcements and bluegrass music
- 22) What type of sound amplification will be provided (DJ, Band, etc.)? Please list all that apply.
Bluegrass
- 23) During what time period is sound amplification requested? 7:45 - 9:00
- 24) If for entertainment, give details of entertainment being provided (i.e. number of musicians, type of music, amp wattage, etc.). 5 musicians
- 25) Will any stages, amusement attractions, or amusement rides, including inflatables, be erected for the event? Circle Yes or No. If yes, Applicant must give specific details as to the location and type of games/activities, i.e. inflatables, Horseshoes, relay races, etc. along with the name of the company providing the stages and/or activities. Applicant must also include a copy of that company's insurance certificate indicating coverage and listing the City of Franklin as additional insured. ***For stages, tents, inflatables, etc. constructed on site prior to the event, that date must be included on Certificate of Insurance provided to the City of Franklin. Stages MUST be removed from site at end of event. ***Rented inflatables/interactives that are set-up and manned by applicant must be included specifically in applicant's Certificate of Insurance.
- 26) What, if any, vendors will be present at event? (i.e. medical related, shirts, arts, etc.) Please provide detailed list. Use additional sheets. N/A
- 27) Will food, beverages, or merchandise be sold or given away? Circle Yes or No. If yes, clean-up is required. Please provide name of clean-up provider, contact, and phone number of person on-site during event. See Question #28. _____
- 28) Events under 200 participants require a \$250 refundable security deposit at the time of approval. For events over 200, a \$1000 security deposit is required upon approval. If clean-up is not done properly, the organization requesting the permit will be fined (See Attachment A). Applicant's event coordinator or representative and a City of Franklin representative will conduct a Pre-Event meeting prior to event date for Pre-Event Check List Site Review. *At the end of the event, a Post-Event Check List shall be completed by the Applicant's event coordinator, or representative, and a City of Franklin representative to re-assess the site for trash and damage, and to secure with caution tape and signage (provided by event group) any tents left for removal.* Damage deposit will be refunded after a satisfactory Post Event Check List has been completed and signed off on by both the City of Franklin and organization requesting event.

- 29) ***NOTE:** Events that include deep frying cooking oil operations are required to have a grease pit on-site and contract with a grease waste hauler to handle the grease waste and removal of the grease pit. A copy of this agreement shall be filed along with this application. The primary event sponsor is required to remove all cooking grease from the site immediately after the event. Illegal dumping of cooking grease will be prosecuted. *Please read Additional Requirements section of this application for more information.*
- 30) Will you require a temporary water tap? Circle Yes or No if yes, please list exact locations:

- 31) Will alcohol, beer, and/or wine be given away or sold? Circle Yes or No. If yes, a permit from the relevant board is required. *Please read Additional Requirements section of this application for more information.*
- 32) Will your event include tents or other temporary structures, propane use, or open flames? Circle yes or no. Events using tents of size 20 x 10 or larger require permitting from Franklin Fire Department. Safety measures must be provided on all tents, especially those set-up prior to the actual event. Tents should be taken down the date the event has ended. *Please read Additional Requirements section of this application for more information.*
- ✓ 33) Attach Good Neighbor Letter and Mailing List used. *Please read Additional Requirements section of this application for more information.*

TITLE VI OF THE 1964 CIVIL RIGHTS ACT

"No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

The City of Franklin does not discriminate based on race, color or national origin in federal or state sponsored programs, pursuant to Title VI of the Civil Rights Acts of 1964 (42 U.S.C. 2000d). For more information or to file a complaint against the City of Franklin under Title VI of the 1964 Civil Rights Act, contact the Title VI Coordinator:

Rodney Escobar
Risk Manager
City of Franklin
109 Third Avenue South
Franklin, Tennessee 37064
615.791.3277

The City of Franklin is committed to providing reasonable access and accommodations upon request for people with disabilities. Please call the Risk Management Department at (615)791-3277 for specific requests.



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PLEASE READ ATTACHMENTS BEFORE SIGNING APPLICATION.

- 1) I/We agree to abide by all ordinances and regulations of the City of Franklin and all conditions placed upon the event by the City Administrator and the Board of Mayor and Aldermen.
- 2) I/We do swear or affirm that all of the information given in this application is true and complete.
- 3) I/We do hereby agree to assume the defense of and indemnify and save harmless the City, its aldermen, boards, commissions, officers, employees and agents, from all suits, actions, damages or claims to which the City may be subjected of any kind or nature whatsoever resulting from, caused by, arising out of or as a consequence of such event and the activities permitted in connection there with, and to submit a certificate of insurance prior to the event in an amount acceptable to the City Administrator.
- 4) I/We agree to provide a copy of this signed Event Application to any vendors, planners, and related parties associated with the event to ensure they are familiar with the guidelines set forth herein.
- 5) I/We understand that I/we assume the responsibility of the actions of any vendors, planners, and related parties for this event.
- 6) I/We understand that granting of Special Event Permit does not imply granting of other permit that is separately required.
- 7) The application for an event permit shall be filed not less than 90 days nor more than 364 days prior to the scheduled date of such event. Suggested filing is at least 180 days prior to scheduled event. Events should not be advertised or promoted until an event permit has been obtained from the City. Failure to file in a timely manner may result in denial of a permit.
- 8) The City reserves the right to require one or more City of Franklin police officers or other emergency personnel be present at any and all events that occur within the city limits. Please budget for this request at a rate of \$30 per hour at a minimum of two (2) hours.

BY: *J. Michael Giff* Date: 1/13/14
(Signature and title -- must be officer of organization)

Approved by the Board of Mayor and Aldermen on _____, 20__.

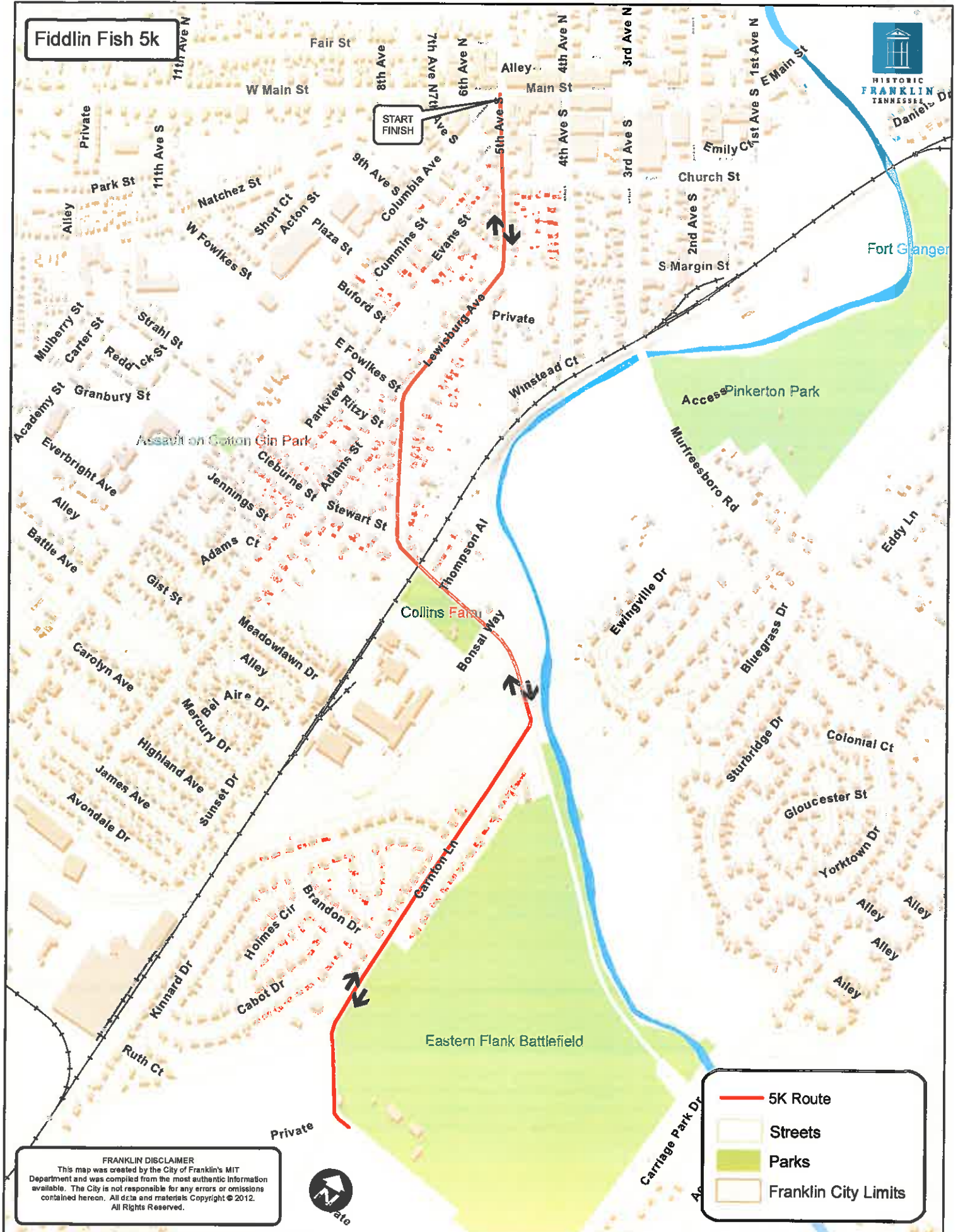
Dr. Ken Moore, Mayor

Eric S. Stuckey, City Administrator

If you have questions concerning your request, please call 615-550-6606.

 * Return application to: *
 * City Administrator's Office *
 * City Hall *
 * 109 Third Ave South *
 * Franklin, TN 37065 *
 * 615-791-3217 *
 * 615-790-0469 (FAX) *

Fiddlin Fish 5k



START
FINISH

FRANKLIN DISCLAIMER
 This map was created by the City of Franklin's MIT Department and was compiled from the most authentic information available. The City is not responsible for any errors or omissions contained herein. All data and materials Copyright © 2012. All Rights Reserved.



- 5K Route
- Streets
- Parks
- Franklin City Limits

Works in Progress Sunday School Class
Franklin First United Methodist Church

List of Addresses for Good Neighbor Letter
Application for Franklin First's Fiddlin' Fish 5K

Fifth Avenue South

201	Frances Haynes
209	William E. Walton
215	Christian Friesinger
217	Margaret Scruggs
219	James Redford
221	Suntrust Bank
223	Suntrust Bank
225	Suntrust Bank
202	James Smith
210	Mamie McArthur
216	Edward Jordan
218	Robert Rowland
220	Stephanie Jenkins
222	Rebecca Hicks
226	John D. Wood
515 Church Street	Peter Furler
438 S. Margin	Suntrust
501 S. Margin	Lillian Stewart
1102 Adams St.	Betty Horn
303 Berry Cir.	O'More School of Design
305 Berry Cir.	Frank Irvin
307 Berry Cir.	Nancy Berry
311 Berry Cir.	Kenneth Moore
306 Berry Cir.	A&B Investments
302 Berry Cir.	Bobby Hatchett

Lewisburg Avenue

101	O'More School of Design
103	O'More School of Design
105	O'More School of Design
109	O'More School of Design
111	Michael Tanner
115	Linda McGory
117	Harry Billington
119	Ronald Payne
121	Matthew J. Hill
123	Timothy Adgent
201	Boardman Stewart
203	Curtis Gibbs
205	Ryan Rettler
207	David Foster
209	Robert Crosby
211	Robert Crosby Sr.
213	Gale Haddock
215	Robert Garner
217	Historic Home Builders LLC
219	Linda Stubblefield
221	D'Lorah Lane
301	James Green
403	Maye Hill
405	Mable Stewart
407	Arthur Hodge Est\
417	Aundria Reed
419	Aundria Reed
421	Mariah Blakely
102	Daniel Cremin
104	Curtis Nicholson
106	Ned Jones
108	James Jewell Jr.
110	Eulalie Jefferson
112	Catherine Burns
114	Daniel Klatt
116	Larry Cognata
118	John Pavlejc
120	Danny Nelms
122	William Adair Jr.
200	Sherman Anderson
202	A D Haber III
204	Robert Bass
206	Edmund Nance Jr.
208	Simon Waterlow

Lewisburg Avenue

210	Salli Lagrone
212	William Ewin Jr.
300	Margaret Macpherson
302	Laurel Aiello
418	Save the Franklin Battlefield Inc.
422	Bonsal American Inc.
424	James Huskey
428-30	Ron Taylor

Thompson Alley

1136	Leonard Jones
1140	Maye Hill
1142	Verlia Burns
1143	Frank Roberson
1144	Euford Miller
125	McPhail Scruggs
126	Lee Jenkins
129	Tom Scruggs

Carnton Lane

1132	David Grow
1136	Kirk McCaleb
1140	Billy Etue
1200	Paul Hoppe
1204	David Jackewicz
1208	James Parker
1212	Walter Latture
1216	Christopher Campbell
1220	Eric Ross
1224	Jimmy Moore
1228	Luke Dunn
1300	Newton Walker
1304	David Mrozinski
1310-16	Frances Erwin
1328	Thomas Miller
1344-46	David Carr

1115A-1 through A-5	Eloise North
1119	James VonGruenigen
1123	Ronald Taylor
1127	Gary Carrigan
1131	Anthony Greer
1135	Glen Hunter

Carnton Lane

1139
1143
1201
1205
1207
1211
1215
1219

Kenneth Burbage
Joanie Abernathy
Jeff Bradford
Michael Trailov
Todd Hardy
Mary Howard
Darlene Rebowe
Ronnie Johnson

Kinnard Drive

1304
1308
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Bryan Brand
John Marshall
Robert Sillaman
William Knight
Christian Belzunce
Scott Seybold
David Palmer
Wilda McMeans
John Fisher
Tipton Evans
Virginia Williams
Joe Templeton
Matthew Giblin
Michael Martin
Carl Coleman
Kathryn Cherico
Douglas Beard
Christopher Schneider
Robert Ferris
Charles McNish
Darrel Emerson
Charles Lafont
Jimmy Stephens
Timothy Layne
David Scott
Vernon Pieper
James Brown
Davie Praet
Jason Gilliam
Gregory Duke
Lawrence Sellers
Paul Butts Jr.
Joseph Doughty
William Lasater
Ronald Williams

Kinnard Drive

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1305

Michael Hines
Morris Sammons
Jerry Shockey
John Cain
William Large
Morton Stein
Joseph Sessions
Elmer Matto Jr.
David Beeny
Anthony Johnson
Gary Moody
Gary Peevely
Anthony Dainora
Hugh Coltharp
Brent Moelker
Russel Carrigan
Daniel Blevins
Michael Weeks
Mark Traxler
Edward Goehner
William Rodgers
Marshel Spitzer
David Sullivan
John Altshuler
Shay Evans

St. Michaels Court

1000
1004
1008
1012
1013
1009
1005

Margaret Southgate
Denise Andre
Joseph Hale
David Boyd
James Thomson
Ronald Spaid
Donald Welch

Brandon Drive

1100	Jason Houser
1104	Frank Minter Jr.
1108	Carroll Roose
1112	John Trew Jr.
1116	Ryan McNeary
1120	Roger Cathey
1124	James Cunningham
1121	Robert Zimmerman
1113	Mark Tornow
1109	Maurine Alexander
1105	Christopher Jackson
1101	Richard Yuill

Holmes Circle

1504	Neal Miller
1508	Alex Marks
1512	Terry Thomas
1516	L. Ollen Crowder Jr.
1520	Larry Pruitt
1524	Wallace Post Jr.
1528	Steven Shaver
1532	Ronald Ellis
1536	Richard Billings
1525	Fred Oettei
1521	Andrew Hanscom
1517	Elizabeth Yates
1513	Dan Sanderson
1509	Robert Marrero
1505	Edward Strong II

Cabot Drive

1504	James Lanier III
1508	Frederic Pepin
1512	Betty Parker
1516	Ralph Genoble Jr.
1520	Kevin Adams
1524	Robert Nichols
1528	David Maddox
1604	Thomas Jackson
1608	Kenneth Morrow
1616	Cheryl Landis
1620	Robert Johnson
1624	Franklin Bayse
1629	Adolph Vedder
1625	Alma Ashby

Cabot Drive

1621	Robert Gill
1617	Wesley Brown Jr.
1613	William Ewen
1609	Lewis Howell
1605	Craig Brent
1601	Kevin Neely
1533	Michael Passmore
1529	Juliet Stockstill
1525	Todd Lewis
1521	Ludovino Diaz
1517	Thomas Clark
1513	Connie Puryear
1509	Steven Pruter
1505	Neal Smith

Ruth Court

1000	Jerry Brannon
1004	John Cottrell
1008	Jacob Kready
1009	William Bickley III
1005	Hector Blair

Others

Downtown Franklin Association
Nancy Williams, Director
P.O. Box 807

Downtown Neighborhood Association
Beverly Roberts, President
215 4th Avenue South

Carnton
1345 Carnton Lane

Heath Place HOA
Jenny Rodgers
1405 Kinnard Drive



PO Box 340029
Nashville, TN 37203-0029

August 21, 2007

FIRST UNITED METHODIST CHURCH
c/o Reverend Dr. A. Lynn Hill
143 5th Avenue South
Franklin, TN 37064

Re: Certification of Inclusion in The United Methodist Church Group Tax Exemption Ruling
Affiliated Organization: First United Methodist Church
Affiliated Organization's Employer Identification Number (EIN): 91-2194790
Date of Inclusion: December 12, 2002

Dear Reverend Hill:

This letter will certify that the affiliated organization named above has been and continues to be included in The United Methodist Church Group Tax Exemption Ruling ("UMC Group Ruling"). In particular, as stated in the group ruling determination letter issued to The United Methodist Church by the Internal Revenue Service ("IRS"), this affiliated organization is exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code.

This certification letter is issued by the General Council on Finance and Administration of The United Methodist Church ("GCFA"). As the central organization for the UMC Group Ruling, GCFA has been granted the authority by the IRS to determine which organizations are included in the UMC Group Ruling. The Group Exemption Number is GEN 2573. Thus, this certification letter, together with the enclosed copy of the IRS group ruling determination letter, serves to verify the tax-exempt status of this affiliated organization.

If you have any further questions, please feel free to contact the GCFA Legal Department at (866) 367-4232 or legal@gcfa.org.

Sincerely,

GENERAL COUNCIL ON FINANCE AND ADMINISTRATION OF
THE UNITED METHODIST CHURCH

By: Sandra Lackore
Sandra Lackore
General Secretary and Treasurer

By: J. Daniel Gar
J. Daniel Gar
Associate General Counsel

Enclosures

Department of the Treasury

Internal Revenue Service
Washington, DC 20266

ST 13 WA | T:MM:2012:1-2
Council on Finance and Administration
of the United Methodist
Church, a/k/a the United
Methodist Church and Its
Affiliated Organizations
1200 Davis Street
Springton, Illinois 60281

Attention: R. Bryan Bremer



Dear Applicant:

This refers to the information submitted for use in determining your status and the status of your affiliated religious organizations, on the list you submitted, as being exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code.

For the purposes of this group ruling, your affiliated religious organizations include The General Conference, Judicial Council, General Agencies, Commissions, Committees, their divisions and departments thereof, and other related organizations; Jurisdictional Conferences and Affiliated Agencies, Commissions, and other organizations; Annual Conferences and divisions and departments thereof; Annual Conference Agencies, Commissions, Committees, and affiliated organizations; Local Churches and Local Church Agencies, Commissions, Committees, and other affiliated organizations.

Based on the information supplied, we rule that you and your affiliated religious organizations, on the list you submitted, are exempt from Federal income tax under section 501(c)(3) of the Code.

We have further determined that you and the affiliated religious organizations you operate, supervise, or control, and which are covered by your notification to us, are not private foundations within the meaning of section 509(a) of the Code, because you and your affiliated religious organizations are organizations described in sections 170(b)(1)(A)(i) and 509(a)(1) of the Code.

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**Council on Finance and Administration of the
United Methodist Church, a/k/a the United
Methodist Church and Its Affiliated Organiza-
tions**

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

You and your affiliated religious organizations are not required to file the Return for Organizations Exempt From Income Tax, Form 990, as you come within the excep-
tion contained in section 6019(a)(2)(A)(i) of the Code.

You and your affiliated religious organizations 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 or your affiliated religious organizations 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, or those of your affiliated religious organizations, is unrelated trade or business as defined in section 513 of the Code.

You and your affiliated religious organizations are not liable for social security (FICA) taxes unless you file a waiver of exemption certificate as provided in the Federal Insurance Contributions Act. You and your affiliated religious organizations are not liable for the taxes imposed under the Federal Unemployment Tax Act (FUTA).

Donors may deduct contributions to you and to your affiliated religious organizations as provided by section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to or for your use, or to or for the use of your affiliated religious organizations, are deductible for Federal estate and gift tax purposes under section 2055, 2106, and 2522 of the Code.

If you change your purposes, character, or method of operation, please let your key District Director know so he may consider the effect on your exempt status. Also, please keep him informed of any changes in your name or address.

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**Council on Finance and Administration of the
United Methodist Church, a/k/a the United
Methodist Church and Its Affiliated Organiza-
tions**

You should advise each of your affiliated religious or-
ganizations of the provisions of this ruling, including the
requirements for filing Federal tax returns.

Each year, within 45 days after the close of your
annual accounting period, please send the following to the
Director, Internal Revenue Service Center, 11501 Roosevelt
Boulevard, Philadelphia, Pennsylvania 19155, Attention: EOR
Branch:

1. A statement describing any changes during
the year in the purposes, character, or
method of operation of your affiliated
religious organizations.
2. Lists of the names, mailing addresses, in-
cluding Postal Zip Codes and employer
identification numbers, of your affiliated
religious organizations that during the year:
 - a. changed names or addresses;
 - b. were deleted from your roster; or
 - c. were added to the roster.
3. For affiliated religious organizations to
be added attach:
 - a. a statement that the information
upon which your present group
exemption letter is based applies;
 - b. a statement that each has given you
written authorization to add its
name to the roster;
 - c. a list of those to which the Ser-
vice previously issued exemption
rulings or determination letters; and
 - d. a statement that none of the
affiliated religious organizations
are private foundations as defined
in section 170(e) of the Code.

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**Council on Finance and Administration of the
United Methodist Church, a/k/a the United
Methodist Church and Its Affiliated Organiza-
tions**

4. If applicable, a statement that your group exemption reverter did not change during the year.

This ruling supersedes our ruling letter of November 20, 1945. In addition, this ruling letter supersedes our group exemption letters to your affiliated Annual Conferences and Conferences and to the individual determination or ruling letters issued to your affiliated churches and other affiliated religious organizations.

Please be sure to enter your employer identification number on all your tax returns and in your correspondence with the Internal Revenue Service.

This ruling is not applicable to your affiliated foreign religious organizations.

The key District Director, Internal Revenue Service, Chicago, Illinois, which is your key district for exempt organization matters, will be furnished a copy of this letter. Please keep this ruling in your permanent records.

Thank you for your cooperation.

Sincerely yours,

Milton Green
Milton Green
Chief, Exempt Section 1
Exempt Organizations Branch