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 you are not a private foundation within the meaning of section 509(a) of the Code, because you are an organization described in section 509(a)(1) & 170(b)(1)(A)(i).

If your sources of support, or 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 and foundation 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 contact us. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Since you are not a private foundation, you are not subject to the excise taxes under Chapter 42 of the Code. However, you are not automatically exempt from 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. The effective date of this determination of exemption is January 21, 1980.

The box checked in the heading of this letter shows whether you must file Form 990, Return of Organization Exempt from Income tax. If Yes is checked, you are required to file Form 990 only if your gross receipts each year are normally more than $10,000. If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. The law imposes a penalty of $10 a day, up to a maximum of $5,000, when a return is filed late unless there is reasonable cause for the delay.

31 Hopkins Plaza, Baltimore, MD 21201

Letter 947(DO) (5-77)
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 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.

(see caveats below)

Sincerely yours,

Teddy R. Kern
District Director

Section 508(a)(2) of the Internal Revenue Code states that an organization organized after October 9, 1969, shall not be treated as an organization described in section 501(c)(3) for any period before the giving of notice that it is applying for recognition of exempt status, if such notice is given after the time prescribed by regulations.

Section 1.508(a)(2)(i) of the Income Tax Regulations states that an organization seeking exemption under section 501(c)(3) must file the notice described in section 501(a) within 15 months from the end of the month in which the organization was organized. Such notice is filed by submitting a properly completed and executed Form 1023, exemption application, with the District Director.

Our records indicate that notice was postmarked January 21, 1960, which is more than 15 months from the end of the month in which you were organized. Since the provisions of section 508(a)(2) are applicable to you, the effective date of your exemption is January 24, 1960.

This letter supersedes and corrects our letters of June 10, 1960 and November 19, 1960.
November 15, 1982

Universidad Central Del Caribe, Inc.
154 Norte Avenue, Munoz Rivera
Cayey, PR 00633

Dear Applicant:

This letter is to clarify your exempt status.

On June 25, 1982, an advance ruling letter (L-1046) was erroneously issued to your organization. Please disregard this letter. The letter (L-947) dated December 29, 1981, a copy of which is attached, reflects the correct status of your organization.

Please accept our apologies for any inconvenience or delay that we may have caused you. If you have any further questions, please contact Donna Bayne, Chief, Determination Processing Unit at 301-962-3280.

Sincerely yours,

[Signature]
Teddy R. Kern
District Director

Attachment