

# Group Exemptions

## Tax Exempt and Government Entities Division

---

### What is a group exemption letter?

The IRS sometimes recognizes a group of organizations as tax-exempt if they are affiliated with a central organization. This avoids the need for each of the organizations to apply for exemption individually. A group exemption letter has the same effect as an individual exemption letter except that it applies to more than one organization.

### What is the reason for group exemptions?

Group exemptions are an administrative convenience for both the IRS and organizations with many affiliated organizations. Subordinates in a group exemption do not have to file, and the IRS does not have to process, separate applications for exemption. Consequently, subordinates do not receive individual exemption letters.

### What types of organizations can qualify for group exemptions?

Exempt organizations that have or plan to have related organizations that are very similar to each other may apply for a group exemption.

### What are central and subordinate organizations?

Groups of organizations with group exemption letters have a "head" or main organization, referred to as a central organization. The central organization generally supervises or controls many chapters, called subordinate organizations. The subordinate organizations typically have similar structures, purposes, and activities.

**Example:** X is a national, fraternal organization exempt under Internal Revenue Code ("IRC") section 501(c)(8). X has several state and hundreds of local chapters that have nearly identical articles of incorporation, by-laws, purposes, and activities. As the national organization, X is considered the central organization; the state and local chapters are subordinate organizations and are covered under X's group exemption.

### What criteria must organizations meet to be included in a group exemption?

To qualify for a group exemption, the central organization and its subordinates must have a defined relationship. Subordinates must be:

- Affiliated with the central organization;
- Subject to the central organization's general supervision or control; and
- Exempt under the same paragraph of IRC 501(c), though not necessarily the paragraph under which the central organization is exempt.

Rev. Proc. 80-27, 1980-1 C.B. 677 sets forth additional criteria.

### Must the central organization be recognized by the IRS as tax-exempt before the organization can obtain a group exemption?

No. A central organization may submit its request for a group exemption at the same time it submits its exemption application on Form 1023 or Form 1024. Churches are not required to apply for recognition of their own status in order to be tax-exempt, and the group exemption rules do not change this.

### **Are there any special rules for churches?**

With limited exceptions, churches are subject to the same general requirements relating to group rulings as other organizations. However, churches are not required to file annual updates notifying the IRS of changes in the composition of the group.

### **Where does a central organization apply for exemption and submit a request for a group exemption?**

A central organization sends its application for exemption, the request for a group exemption, and the required user fee, to:

Internal Revenue Service  
P.O. Box 192  
Covington, KY 41012-0192

Or, if using express mail or a delivery service, to:

Internal Revenue Service  
201 West Rivercenter Blvd.  
Attn: Extracting Stop 312  
Covington, KY 41011

### **What must a request for a group exemption contain?**

The central organization submits a letter to the IRS on behalf of itself and its subordinates. The letter includes:

- a. Information verifying the existence of the required relationship;
- b. A sample copy of a uniform governing instrument (such as a charter, trust indenture, articles of association, etc.) adopted by the subordinates;
- c. A detailed description of the purposes and activities of the subordinates including the sources of receipts and the nature of expenditures;

- d. An affirmation by a principal officer that, to the best of the officer's knowledge, the purposes and activities of the subordinates are as set forth in (b) and (c) above;
- e. A statement that each subordinate to be included in the group exemption letter has furnished written authorization to the central organization;
- f. A list of subordinates to be included in the group exemption letter to which the IRS has issued an outstanding ruling or determination letter relating to exemption;
- g. If the application for a group exemption letter involves IRC 501(c)(3), an affirmation to the effect that, to the best of the officer's knowledge and belief, no subordinate to be included in the group exemption letter is a private foundation as defined in IRC 509(a);
- h. For each subordinate that is a school claiming exemption under IRC 501(c)(3), the information required by Rev. Proc. 75-50, 1975-2 C.B. 834 and Rev. Rul. 71-447, 1971-2 C.B. 230; and
- i. A list of the names, mailing addresses (including zip code), actual addresses (if different), and employer identification numbers of subordinates to be included in the group exemption letter. A current directory of subordinates may be furnished in lieu of the list if it includes the required information and if the subordinates not to be included in the group exemption letter are identified.

The rules for applying for a group exemption are set forth in Rev. Proc. 80-27, 1980-1 C.B. 677.

## How does the group exemption process work?

Upon receipt of an application Form 1023 or 1024 and a request for group exemption, the IRS first determines whether the central organization and the existing subordinates qualify for tax exemption. Once the IRS grants the exemption, the central organization is responsible for: (1) ensuring that its current subordinates continue to qualify to be exempt; (2) verifying that any new subordinates are exempt; and (3) updating the IRS on an annual basis of new subordinates, subordinates no longer to be included, and subordinates that have changed their names or addresses.

## What is included in an annual update?

Annual updates must contain the following information:

- a. Information about changes in purposes, character, or method of operation of subordinates included in the group exemption letter.
- b. Lists of :
  1. subordinates that have changed their names or addresses during the year;
  2. subordinates no longer to be included in the group exemption letter because they have ceased to exist, disaffiliated, or withdrawn their authorization to the central organization; and
  3. subordinates to be added to the group exemption letter because they are newly organized or affiliated or have newly authorized the central organization to include them.

Each list must show the names, mailing address (including zip codes), actual address if different, and employer identification numbers of the affected subordinates.

An annotated directory of subordinates will not be accepted for this purpose. If none of these changes occurred, the central organization must submit a statement to that effect.

- c. The same information about new subordinates that was required in the initial request. If a new subordinate does not differ in any material respects from the subordinates included in the original request, however, a statement to this effect may be submitted in lieu of detailed information.

## Where does a central organization submit an annual update?

Annual updates go to the Ogden Service Center, Mail Stop 6271, Ogden, UT 84404-4749. Six months before the update is due, the IRS sends the central organization a list of currently listed subordinates, sometimes called *List of Parent and Subsidiary Accounts*.

## What are the filing requirements for organizations that hold group exemptions?

A group exemption letter does not change the filing requirements for exempt organizations. The central organization and the subordinates must file Forms 990 (or 990-EZ), unless they meet a filing exception. If it is required to file an annual return, the central organization must file its own separate return but may also file a group return on behalf of some or all of its subordinates. If the central organization files on behalf of some of its subordinates, rather than all, it must attach a list of the subordinates included in the return.

### **How do I verify that an organization is included as a subordinate in a group exemption ruling?**

The central organization that holds a group exemption (rather than the IRS) determines which organizations are included as subordinates under its group exemption ruling. Therefore, you can verify that an organization is a subordinate under a group exemption ruling by consulting the official subordinate listing approved by the central organization or by contacting the central organization directly. You may use either method to verify that an organization is a subordinate under a group exemption ruling.

### **How do donors verify that contributions are deductible under section 170 with respect to a subordinate organization in a section 501(c)(3) group exemption ruling?**

Donors should consult IRS Publication 78, *Cumulative List of Organizations described in Section 170(c) of the Internal Revenue Code of 1986*, or obtain a copy of the group exemption letter from the central organization. The central organization's listing in Publication 78 will indicate that contributions to its subordinate organizations covered by the group exemption ruling are also deductible, even though most subordinate organizations are not separately listed in Publication 78 or on the EO Business Master File. Donors should then verify with the central organization, by either of the methods indicated above, whether the particular subordinate is included in the central organization's group exemption ruling. The subordinate organization need not itself be listed in Publication 78 or on the EO Business Master File. Donors may rely upon central organization verification with respect to deductibility of contributions to subordinates covered in a section 501(c)(3) group exemption ruling.

### **Where can an organization get additional information?**

You can get more information about group exemptions and the group ruling process from the IRS Exempt Organizations Division:

#### **EO Web Site [[www.irs.gov/eo](http://www.irs.gov/eo)]**

Publication 557, *Tax-Exempt Status for Your Organization*.

#### **EO Customer Account Services**

You may direct questions about group exemptions to the IRS Tax Exempt and Government Entities Customer Account Services at (877) 829-5500 (toll-free number).

If you prefer to write, you may write us at:

Internal Revenue Service  
Exempt Organizations Determinations  
P.O. Box 2508  
Cincinnati, OH 45201



Department of the Treasury  
Internal Revenue Service

---

[www.irs.gov](http://www.irs.gov)

---

Publication 4573 (12-2006)  
Catalog Number 49351Q

---

## Memorandum

February 12, 2007

Re: The Salvation Army - Federal Income Tax Exemption

This Firm acts as general counsel to the National Headquarters of The Salvation Army in the United States. This memorandum is intended to provide guidance relating to the exemption of The Salvation Army from Federal income taxation as an organization described in Section 501(c)(3) of the Internal Revenue Code of 1986, as amended (the "Code"), and the deductibility of contributions to The Salvation Army pursuant to Section 170 of the Code.

As a part of the International Salvation Army, The Salvation Army is organized in the United States with a National Headquarters located in Alexandria, Virginia, and four Territorial Headquarters, the Central Territory in Des Plaines, Illinois with jurisdiction over the eleven northcentral States,<sup>1</sup> the Eastern Territory in West Nyack, New York, with jurisdiction over the eleven northeastern States, Puerto Rico and the Virgin Islands,<sup>2</sup> the Southern Territory in Atlanta with jurisdiction over the 15 southeastern States,<sup>3</sup> and the Western Territory in Long Beach, California, with jurisdiction over the 13 western States.<sup>4</sup>

All of the activities of The Salvation Army in the respective Territories are conducted under the supervision of the Territorial Headquarters, each of the Territories being subdivided into Divisions which, in turn, oversee the Corps and other local institutions and services.

---

<sup>1</sup> The Central Territory comprises the States of Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, North Dakota, South Dakota and Wisconsin.

<sup>2</sup> The Eastern Territory comprises the States of Connecticut, Delaware, Maine, Massachusetts, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island and Vermont, certain counties in Kentucky, Puerto Rico and the Virgin Islands.

<sup>3</sup> The Southern Territory comprises the States of Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Maryland, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, excluding El Paso, Virginia and West Virginia.

<sup>4</sup> The Western Territory comprises the states of Alaska, Arizona, California, Colorado, Hawaii, Idaho, Montana, New Mexico, Nevada, Oregon, Utah, Washington, Wyoming and El Paso, Texas.

## C A D W A L A D E R

As a legal matter, the properties in each Territory are owned, and the affairs of the Territory are conducted, by a non-profit corporation named "The Salvation Army" organized in the State in which the Territorial Headquarters is located<sup>5</sup> and legally qualified to conduct its affairs in the other States over which the Territorial Headquarters has jurisdiction. With the exception of certain separate tax-exempt, non-profit corporations required for the operation of particular programs, all of the activities of The Salvation Army in the United States are conducted by the Territorial corporations, with coordination by The Salvation Army National Headquarters, separately incorporated as "The Salvation Army National Corporation".

The National Commander of The Salvation Army in the United States is ex officio Chairman of the Board of all Salvation Army corporations in the United States, including all four Territorial corporations. The Territorial Commanders of the four Territories comprise a majority of the Board of Trustees of The Salvation Army National Corporation.

Attached are copies of (a) I.T. 2747, XII-2 C.B. 70 (1933), the ruling of the Bureau of Internal Revenue that "The Salvation Army is exempt from Federal income tax", which stated that "this ruling is applicable to all branches of the organization which are component parts of its national organization and have similar purposes and activities", (b) the letter ruling of the Assistant Commissioner of Internal Revenue addressed to this Firm, dated October 10, 1955, finding that The Salvation Army in the United States is "organized into four Territories under the general supervision of a National Headquarters", holding that "the National Headquarters of The Salvation Army and its various components throughout the United States constitute a church or convention or association of churches", and confirming the 1933 ruling regarding the exemption of "the Salvation Army and its State and Regional organizations and local posts" from Federal income tax, and (c) Revenue Ruling 59-129, 1959-1, C.B. 58, in effect confirming the 1955 letter ruling. Attached also are more recent letters from the IRS addressed to each of the four Territories of The Salvation Army in the United States confirming the Federal income tax exemption based on the 1933 ruling.

Within the terms of I.T. 2747, each of The Salvation Army's Central, Eastern, Southern and Western Territories and the four corresponding Territorial corporations are branches of The Salvation Army which are "component parts" of The Salvation Army in the United States and have "similar purposes and activities" and, within the terms of the October 10, 1955 letter ruling, are "components" of the National Headquarters of The Salvation Army.

Accordingly, the attached 1933 determination (as confirmed in the enclosed 1955 letter ruling and the more recent letters from the IRS) that "The Salvation Army" and the "component parts of its national organization" are exempt from Federal income tax applies to each of the Central,

---

<sup>5</sup> The states of incorporation of the four Territorial corporations are Illinois for the Central Territory, New York for the Eastern Territory, Georgia for the Southern Territory and California for the Western Territory.

## C A D W A L A D E R

Eastern, Southern and Western Territories in the United States and to the four corresponding Territorial corporations. More generally, the attached determinations establish that The Salvation Army in the United States, including all of its corporations, Territories, Divisions, Corps, institutions and other unincorporated branches, is (a) exempt from Federal income tax under Section 501(a) of the Code as an organization described in Section 501(c)(3), (b) a "church or a convention or association of churches within the meaning of Section 170(b)(1)(a)(i) of the Code, and (c) is not a private foundation as defined in Section 509(a) of the Code because it is an organization described in Section 170 (b) (1) (a) (i) of the Code.

Members of the public seeking confirmation of the exemption of any Salvation Army unit in the United States are directed to either of the following IRS online listings, both of which are applicable to all units of The Salvation Army in each of the Central, Eastern, Southern and Western Territories:

1. The public may access the online version of IRS Publication 78, "Cumulative List of Organizations Described in Section 170(c) of the Internal Revenue Code of 1986" (the "Cumulative List") on the "www.irs.gov" web site by clicking on "Charities & Non-Profits", then "Search for Charities", then "Search Now". A search for the phrase "Salvation Army" under the State of New York will reveal among other listings, the national listing for "Salvation Army & Its Components Att Finance Dept" in West Nyack, New York. The Cumulative List does not include Federal employer identification numbers ("EINs").
2. The public may also access the IRS electronic exempt organizations database, which includes EINs, on the "www.irs.gov" web site by clicking on "Tax Stats", then "Exempt Org. Master File". On the "Exempt Organizations: IRS Master File Data" web page, the searcher should click on "New York". Within the New York file, a search for "Salvation Army" will reveal, among other listings, the national listing for "Salvation Army & Its Components Att Finance Dept" located at 440 West Nyack Road in West Nyack, New York and identified by EIN 133485289.

In both cases, the listings are linked to the State of New York because The Salvation Army's national office was located in New York at the time of the original exemption determination. Again, all Salvation Army units within the Central, Eastern, Southern and Western Territories are covered by the exemption determination identified above in the Cumulative List and in the IRS electronic exempt organization database by EIN 133485289. However, local units of The Salvation Army have been issued separate EINs for Federal payroll tax reporting purposes. A list of all EINs in this Territory covered by the national exemption ruling has also been attached to this Memorandum.

Members of the public seeking confirmation of the exemption of any Salvation Army unit in the United States are also referred to IRS Publication 4573 regarding Group Exemptions,

## C A D W A L A D E R

available on the IRS web site at "<http://www.irs.gov/pub/irs-tege/p4573.pdf>", which includes guidance from the IRS with respect to how potential donors should verify that an organization is included as a subordinate in a group exemption ruling. In particular, reference is made to the two questions and answers on the last page of such publication that clarify that donors should request such verification from the exempt organization, not from the IRS.

IRS Circular 230 requires us to advise you that this Memorandum is not intended or written for use, and cannot be used, for the purpose of avoiding Federal, State or local tax penalties.



## Internal Revenue Bulletin

Cumulative Bulletin XII-2

JULY-DECEMBER, 1933

[1103, Art. 527.]

70

ARTICLE 527: Religious, charitable, scientific, literary, and educational organizations and community chests.  
(Also Section 23(n), Article 261.)

XII-32-6576  
I. T. 2747

## REVENUE ACT OF 1932 AND PRIOR REVENUE ACTS.

The Salvation Army is exempt from Federal income tax under section 103(6) of the Revenue Act of 1932 and the corresponding provisions of prior Revenue Acts. Contributions made to it by individuals are deductible by them in computing net income, subject to the limitation prescribed by section 23(n) of the Revenue Act of 1932 and the corresponding provisions of prior Revenue Acts.

This ruling is applicable to all branches of the organization which are component parts of its national organization and have similar purposes and activities.

Advice is requested whether the Salvation Army is exempt from Federal income tax, and whether contributions made to the Salvation Army and its various branches are allowable deductions in the income tax returns of individual donors.

The organization was incorporated without capital stock in 1899 under an act entitled "An act to provide for the incorporation of the Salvation Army." (See ch. 408, Laws of New York State, 1899.) The certificate of incorporation provides in part as follows:

Fifth. Said The Salvation Army is designed to operate as a religious and charitable corporation in all the States and Territories of the United States.

Sixth. The general objects and purposes of the Salvation Army are as follows: To have the custody and control of all the temporalities and property, real and personal, belonging to the Salvation Army in the United States, and revenues therefrom, and the administration of the same in accordance with the discipline, rules and usages of the Salvation Army. To see that the entire receipts, revenues and emoluments derived therefrom and from all the various branches of its work, are devoted exclusively to the benevolent, religious and philanthropic purposes of the Salvation Army in the United States, with the exception of a moderate and reasonable compensation to those conducting and having the management of its objects and purposes.

For the spiritual, moral and physical reformation of the working classes; for the reclamation of the vicious, criminal, dissolute and degraded; for visitation among the poor and lowly and the sick; for the preaching of the Gospel and the dissemination of Christian truth by means of open-air and indoor meetings.

71

[1103, Art. 522.]

The evidence submitted shows that the organization has established throughout various parts of the United States places for religious meetings, lodging shelters for the poor, homes for the rescue of fallen women, hospitals, etc., which are conducted as a part of its religious and charitable work. It appears that all branches of the organization are component parts of its national organization and have similar purposes and activities.

The corporation's income is derived from contributions, legacies, endowments, and from the sale of donated waste material, books, periodicals, and other articles. The corporation receives aid in the form of city and State grants toward the cost of operating women's and children's homes, hospitals, and nurseries. The income is used to pay for the maintenance of men's and women's social institutions, women's and children's homes, hospitals, nurseries, and fresh air camps, to carry on family welfare work and religious activities, and to defray general administrative expenses. No officer, member, or employee receives any pecuniary profit from the corporation's operations except reasonable compensation for services rendered.

Based on the foregoing, it is held that the Salvation Army is entitled to exemption under the provisions of section 103(6) of the Revenue Act of 1932 and the corresponding provisions of prior Revenue Acts. The corporation is not, therefore, required to file returns for 1932 and prior years and future returns will not be required so long as there is no change in the organization, its purposes, or methods of doing business.

Since it is held that the corporation is entitled to exemption under paragraph (6) of section 103 of the Revenue Act of 1932 and the corresponding provisions of prior Revenue Acts, it follows that contributions made to it by individuals are deductible by them in computing net income, subject to the limitation prescribed by section 23(n) of the Revenue Act of 1932 and the corresponding provisions of prior Revenue Acts.

This ruling is applicable to all branches of the organization which are component parts of its national organization and have similar purposes and activities.



U. S. TREASURY DEPARTMENT

WASHINGTON 25

OFFICE OF  
COMMISSIONER OF INTERNAL REVENUE

ADDRESS ONLY TO  
COMMISSIONER OF INTERNAL REVENUE  
AND REFER TO

T:R:I  
RFW-3

OCT 10 1955.

The Salvation Army  
c/o Cadwalader, Wickersham and Taft  
40 Wall Street  
New York 5, New York

Attention: Mr. H. Gilmer Wells

Gentlemen:

This is in reply to a letter dated August 15, 1955, from Cadwalader, Wickersham and Taft, in which they request reconsideration of our ruling issued on May 27, 1955, to The Salvation Army, Detroit, Michigan, holding that The Salvation Army is not a church or a convention or association of churches referred to in section 170(b)(1)(A)(i) of the Internal Revenue Code of 1954, and that such ruling be revoked. It is also requested that a ruling be issued to the effect that the National Headquarters of The Salvation Army and its various components throughout the United States constitute a church or a convention of churches as that term is used in section 170(b)(1)(A) of the 1954 Code.

It is stated that The Salvation Army is an international unincorporated Christian Church with International Headquarters in London, England; that its churches within the United States are organized into Four Territories under the general supervision of the National Headquarters in New York City; and that the Territories are further subdivided into 48 Divisions, each of which supervises The Salvation Army churches within a state or a part of a state.

The evidence submitted discloses that The Salvation Army has a distinct legal existence, a recognized creed and form of worship, a definite and distinct ecclesiastical government, a formal code of doctrine and discipline, a distinct religious history, a membership not associated with any church or denomination, a complete organization of ordained ministers ministering to their congregations; ordained ministers selected after completing prescribed courses of study, a literature of its

P. L. O.

2 - The Salvation Army

own, established places of worship, regular congregations, regular religious services, Sunday Schools for the religious instruction of the young, and schools for the preparation of its ministers.

It is further stated that in addition to the fundamental ecclesiastical activities as a Christian Church, The Salvation Army also conducts recreational and social programs of the same types as other churches or denominations, and that in working with the spiritually disassociated members of society The Salvation Army found it necessary to administer to the physical needs of those whom it brings spiritual Salvation. For this purpose it maintains shelters for transients, rehabilitation centers for alcoholics, homes and hospitals for unmarried mothers, visiting services for those in prison, nurseries and camps for children of abandoned mothers, and medical and dental clinics. Such activities are under the supervision of Salvation Army officers who are Ministers of the Gospel, and form an integral part of the religious program within the ecclesiastical organization of The Salvation Army.

It is further stated that The Salvation Army is recognized as a church or denomination by other Christian Churches, and has operated effectively in close conjunction with representatives of all faiths throughout local, national and international councils of churches and ministerial associations. At the first Assembly of the World Council of Churches in 1948 five Salvation Army Commanders were international representatives, and one was a member of the Central Committee. The Salvation Army is listed in the 1955 Yearbook of American Churches, published by the National Council of the Churches of Christ in the U. S. A.

Under section 170(b)(1)(A) of the 1954 Code, individuals are allowed an additional deduction of not exceeding 10 percent of their adjusted gross income for contributions made to a church or a convention or association of churches, to educational organizations referred to in section 503(b)(2), and to hospitals referred to in section 503(b)(5).

We have held The Salvation Army and its State and Regional organizations and local posts exempt from Federal income tax under the provisions of section 101(6) of the Internal Revenue Code of 1939, and that contributions made thereto are deductible by the donors in arriving at their taxable net income in the manner and to the extent provided by section 23(o) and (q) of the 1939 Code.

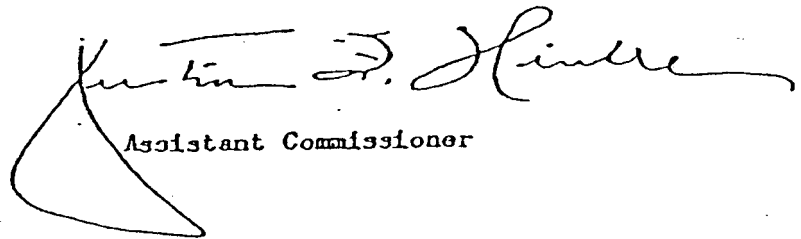
3 - The Salvation Army

Section 101(6) and section 23(o) and (q) of the 1939 Code correspond to section 501(c)(3) and section 170 of the Code of 1954.

Based upon the evidence submitted it is the opinion of this office that the National Headquarters of The Salvation Army and its various components throughout the United States constitute a church or a convention or association of churches as that term is used in section 170(b)(1)(A)(i) of the 1954 Code, and contributions made thereto are deductible by individual donors to the extent of the special rule provided in section 170(b)(1)(A) of the 1954 Code.

The ruling dated May 27, 1955, addressed to The Salvation Army, Detroit, Michigan will be revoked.

Very truly yours,



Assistant Commissioner

# Internal Revenue Bulletin

*Cumulative Bulletin 1959-1*

*January-June 1959*

58

§ 170.]

Rev. Rul. 59-129

The Salvation Army is a church or a convention or association of churches within the meaning of section 170(b)(1)(A)(i) of the Internal Revenue Code of 1954. Accordingly, contributions made by individuals to such organization will be deductible in computing their taxable income to the extent that the aggregate of the contributions allowed as a deduction under section 170(b)(1)(A) of the Code does not exceed ten percent of the individual donor's adjusted gross income. Any such contributions in excess of ten percent of adjusted gross income should be taken into account in computing the amount allow-

59

able as a deduction subject to the general limitation of 20 percent of adjusted gross income provided in section 170(b)(1)(B) of the Code.

Internal Revenue Service

Date: November 15, 2005

THE SALVATION ARMY  
440 WEST NYACK ROAD PO BOX C-635  
WEST NYACK, NY 10994-1715

Department of the Treasury  
P. O. Box 2508  
Cincinnati, OH 45201

Person to Contact:

Roger Meyer  
ID# 31-07707

Toll Free Telephone Number:  
877-829-5500

Federal Identification Number:  
13-5562351

Dear Sir or Madam:

This is in response to your request of November 15, 2005, regarding your tax exempt status. We have updated our records to reflect the address change as indicated above.

Our records indicate that by a ruling made in June 1933, the National Headquarters of the Salvation Army was held to be exempt from federal income tax under section 103(6) of the Internal Revenue Act of 1932, which now corresponds to section 501(c)(3) of the Internal Revenue Code of 1986. Even though the organization was issued an individual ruling, the letter of exemption covers the various component units.

By a ruling dated April 30, 1972, the National Headquarters of the Salvation Army and its components were 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 the organization as provided in section 170 of the Code.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,



Cindy Westcott  
Manager, EO Determinations

**Internal Revenue Service**

**Department of the Treasury  
P. O. Box 2508  
Cincinnati, OH 45201**

**Date:** November 15, 2005

**THE SALVATION ARMY  
% ROBERT BRITTANY  
180 E OCEAN BLVD  
LONG BEACH, CA 90802-4709**

**Person to Contact:**

**Roger Meyer  
ID# 31-07707**

**Toll Free Telephone Number:  
877-829-5500**

**Federal Identification Number:  
94-1156347**

**Dear Sir or Madam:**

This is in response to your request of November 15, 2005, regarding your tax exempt status. We have updated our records to reflect the address change as indicated above.

Our records indicate that by a ruling made in June 1933, the National Headquarters of the Salvation Army was held to be exempt from federal income tax under section 103(6) of the Internal Revenue Act of 1932, which now corresponds to section 501(c)(3) of the Internal Revenue Code of 1986. Even though the organization was issued an individual ruling, the letter of exemption covers the various component units.

By a ruling dated April 30, 1972, the National Headquarters of the Salvation Army and its components were 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 the organization as provided in section 170 of the Code.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,



Cindy Westcott  
Manager, EO Determinations