

## Application for Recognition of Exemption Under Section 501(c)(3) of the Internal Revenue Code

OMB No. 1545-0056  
 If exempt status is approved, this application will be open for public inspection.

Read the instructions for each Part carefully.

**A User Fee must be attached to this application.**

If the required information and appropriate documents are not submitted along with Form 8718 (with payment of the appropriate user fee), the application may be returned to you.

**Part I Identification of Applicant**


<b>1a</b> Full name of organization (as shown in organizing document)  The Breast Cancer Research Foundation, Inc.		<b>2</b> Employer identification number (If none, see instructions.)  13 3727250
<b>1b</b> c/o Name (if applicable) c/o Larry J. Abowitz - Ernst & Young	<b>3</b> Name and telephone number of person to be contacted if additional information is needed  Larry Abowitz  (212) 773-5151	
<b>1c</b> Address (number, street, and room or suite no.) 787 Seventh Avenue - 9th Floor		
<b>1d</b> City or town, state, and ZIP code New York, NY 10019	<b>4</b> Month the annual accounting period ends December	
<b>5</b> Date incorporated or formed August 6, 1993	<b>6</b> Activity codes (See instructions.) 927 125 161	<b>7</b> Check here if applying under section: a <input type="checkbox"/> 501(e)    b <input type="checkbox"/> 501(f)    c <input type="checkbox"/> 501(k)
<b>8</b> Did the organization previously apply for recognition of exemption under this Code section or under any other section of the Code? If "Yes," attach an explanation. <span style="float: right;"><input type="checkbox"/> Yes    <input checked="" type="checkbox"/> No</span>		
<b>9</b> Has the organization filed Federal income tax returns or exempt organization information returns? If "Yes," state the form numbers, years filed, and Internal Revenue office where filed. <span style="float: right;"><input type="checkbox"/> Yes    <input checked="" type="checkbox"/> No</span>		

**10** Check the box for your type of organization. BE SURE TO ATTACH A COMPLETE COPY OF THE CORRESPONDING DOCUMENTS TO THE APPLICATION BEFORE MAILING.

- a  **Corporation**— Attach a copy of your Articles of Incorporation, (including amendments and restatements) showing approval by the appropriate State official; also include a copy of your bylaws.
- b  **Trust**— Attach a copy of your Trust Indenture or Agreement, including all appropriate signatures and dates.
- c  **Association**— Attach a copy of your Articles of Association, Constitution, or other creating document, with a declaration (see instructions) or other evidence the organization was formed by adoption of the document by more than one person; also include a copy of your bylaws.

If you are a corporation or an unincorporated association that has not yet adopted bylaws, check here

I declare under the penalties of perjury that I am authorized to sign this application on behalf of the above organization and that I have examined this application, including the accompanying schedules and attachments, and to the best of my knowledge it is true, correct, and complete.

Please Sign Here 
  
 (Signature)
 

 PRESIDENT  
 (Title or authority of signer)
 

 8-11-93  
 (Date)

For Paperwork Reduction Act Notice, see page 1 of the instructions.

Complete the Procedural Checklist (page 7 of the instructions) prior to filing.

**Part II** Activities and Operational Information

- 1 Provide a detailed narrative description of all the activities of the organization—past, present, and planned. Do not merely refer to or repeat the language in your organizational document. Describe each activity separately in the order of importance. Each description should include, as a minimum, the following: (a) a detailed description of the activity including its purpose; (b) when the activity was or will be initiated; and (c) where and by whom the activity will be conducted.

See Statement Attached

- 2 What are or will be the organization's sources of financial support? List in order of size.

Financial Support will come from contributions from individuals, corporations, foundations and government agencies.

- 3 Describe the organization's fundraising program, both actual and planned, and explain to what extent it has been put into effect. Include details of fundraising activities such as selective mailings, formation of fundraising committees, use of volunteers or professional fundraisers, etc. Attach representative copies of solicitations for financial support.

See Part II, item 1, above

**Part II** Activities and Operational Information (Continued)

**4** Give the following information about the organization's governing body:

**a** Names, addresses, and titles of officers, directors, trustees, etc.

**b** Annual Compensation

See Statement Attached

None

**c** Do any of the above persons serve as members of the governing body by reason of being public officials or being appointed by public officials?  Yes  No  
If "Yes," name those persons and explain the basis of their selection or appointment.

**d** Are any members of the organization's governing body "disqualified persons" with respect to the organization (other than by reason of being a member of the governing body) or do any of the members have either a business or family relationship with "disqualified persons"? (See the specific instructions for line 4d.)  Yes  No  
If "Yes," explain.

See Statement Attached

**5** Does the organization control or is it controlled by any other organization?  Yes  No  
Is the organization the outgrowth of (or successor to) another organization, or does it have a special relationship with another organization by reason of interlocking directorates or other factors?  Yes  No  
If either of these questions is answered "Yes," explain.

**6** Does or will the organization directly or indirectly engage in any of the following transactions with any political organization or other exempt organization (other than 501(c)(3) organizations): (a) grants; (b) purchases or sales of assets; (c) rental of facilities or equipment; (d) loans or loan guarantees; (e) reimbursement arrangements; (f) performance of services, membership, or fundraising solicitations; or (g) sharing of facilities, equipment, mailing lists or other assets, or paid employees?  Yes  No  
If "Yes," explain fully and identify the other organizations involved.

**7** Is the organization financially accountable to any other organization?  Yes  No  
If "Yes," explain and identify the other organization. Include details concerning accountability or attach copies of reports if any have been submitted.

**Part II** Activities and Operational Information (Continued)

**8** What assets does the organization have that are used in the performance of its exempt function? (Do not include property producing investment income.) If any assets are not fully operational, explain their status, what additional steps remain to be completed, and when such final steps will be taken. If "None," indicate "N/A."

**See Statement Attached**

**9a** Will any of the organization's facilities or operations be managed by another organization or individual under a contractual agreement?  Yes  No

**b** Is the organization a party to any leases?  Yes  No

If either of these questions is answered "Yes," attach a copy of the contracts and explain the relationship between the applicant and the other parties.

**10** Is the organization a membership organization?  Yes  No  
If "Yes," complete the following:

**a** Describe the organization's membership requirements, and attach a schedule of membership fees and dues.

**b** Describe your present and proposed efforts to attract members, and attach a copy of any descriptive literature or promotional material used for this purpose.

**c** What benefits do (or will) your members receive in exchange for their payment of dues?

**11a** If the organization provides benefits, services or products, are the recipients required, or will they be required, to pay for them?  N/A  Yes  No  
If "Yes," explain how the charges are determined, and attach a copy of your current fee schedule.

**b** Does or will the organization limit its benefits, services or products to specific individuals or classes of individuals?  N/A  Yes  No  
If "Yes," explain how the recipients or beneficiaries are or will be selected.

**12** Does or will the organization attempt to influence legislation?  Yes  No  
If "Yes," explain. Also, give an estimate of the percentage of the organization's time and funds which it devotes or plans to devote to this activity.

**13** Does or will the organization intervene in any way in political campaigns, including the publication or distribution of statements?  Yes  No  
If "Yes," explain fully.

**Part III** Technical Requirements

**1** Are you filing Form 1023 within 15 months from the end of the month in which you were created or formed?  Yes  No  
If you answer "Yes," do not answer questions 2 through 6.

**2** If one of the exceptions to the 15-month filing requirement shown below applies, check the appropriate box and proceed to question 7.

**Exceptions**—You are not required to file an exemption application within 15 months if the organization:

- (a) Is a church, interchurch organization, local unit of a church, a convention or association of churches, or an integrated auxiliary of a church;
- (b) Is not a private foundation and normally has gross receipts of not more than \$5,000 in each tax year; or,
- (c) Is a subordinate organization covered by a group exemption letter, but only if the parent or supervisory organization timely submitted a notice covering the subordinate.

**3** If you do not meet any of the exceptions in question 2, do you wish to request relief from the 15-month filing requirement?  Yes  No

**4** If you answer "Yes" to question 3, please give your reasons for not filing this application within 15 months from the end of the month in which your organization was created or formed. (See the instructions before completing this item.)

**5** If you answer "No" to both questions 1 and 3 and do not meet any of the exceptions in question 2, your qualification as a section 501(c)(3) organization can be recognized only from the date this application is filed with your key District Director. Therefore, do you want us to consider your application as a request for recognition of exemption as a section 501(c)(3) organization from the date the application is received and not retroactively to the date you were formed?  Yes  No

**6** If you answer "Yes" to question 5 above and wish to request recognition of section 501(c)(4) status for the period beginning with the date you were formed and ending with the date your Form 1023 application was received (the effective date of your section 501(c)(3) status), check here  and attach a completed page 1 of Form 1024 to this application.

**Part III** Technical Requirements (Continued)

7 Is the organization a private foundation?

- Yes (Answer question 8.)  
 No (Answer question 9 and proceed as instructed.)

8 If you answer "Yes" to question 7, do you claim to be a private operating foundation?

- Yes (Complete Schedule E)  
 No

After answering this question, go to Part IV.

9 If you answer "No" to question 7, indicate the public charity classification you are requesting by checking the box below that most appropriately applies:

**THE ORGANIZATION IS NOT A PRIVATE FOUNDATION BECAUSE IT QUALIFIES:**

- |   |   |
|---|---|
| (a) <input type="checkbox"/> As a church or a convention or association of churches<br>(CHURCHES MUST COMPLETE SCHEDULE A).   | Sections 509(a)(1)<br>and 170(b)(1)(A)(i)                             |
| (b) <input type="checkbox"/> As a school (MUST COMPLETE SCHEDULE B).  | Sections 509(a)(1)<br>and 170(b)(1)(A)(ii)                            |
| (c) <input type="checkbox"/> As a hospital or a cooperative hospital service organization, or a<br>medical research organization operated in conjunction with a hospital<br>(MUST COMPLETE SCHEDULE C).   | Sections 509(a)(1)<br>and 170(b)(1)(A)(iii)                           |
| (d) <input type="checkbox"/> As a governmental unit described in section 170(c)(1).   | Sections 509(a)(1)<br>and 170(b)(1)(A)(v)                             |
| (e) <input type="checkbox"/> As being operated solely for the benefit of, or in connection with, one<br>or more of the organizations described in (a) through (d), (g), (h), or (i)<br>(MUST COMPLETE SCHEDULE D).  | Section 509(a)(3)   |
| (f) <input type="checkbox"/> As being organized and operated exclusively for testing for public<br>safety.  | Section 509(a)(4)   |
| (g) <input type="checkbox"/> As being operated for the benefit of a college or university that is<br>owned or operated by a governmental unit.  | Sections 509(a)(1)<br>and 170(b)(1)(A)(iv)                            |
| (h) <input checked="" type="checkbox"/> As receiving a substantial part of its support in the form of<br>contributions from publicly supported organizations, from a<br>governmental unit, or from the general public.  | Sections 509(a)(1)<br>and 170(b)(1)(A)(vi)                            |
| (i) <input type="checkbox"/> As normally receiving not more than one-third of its support from<br>gross investment income and more than one-third of its support from<br>contributions, membership fees, and gross receipts from activities<br>related to its exempt functions (subject to certain exceptions). | Section 509(a)(2)   |
| (j) <input type="checkbox"/> We are a publicly supported organization but are not sure whether we<br>meet the public support test of block (h) or block (i). We would like the<br>Internal Revenue Service to decide the proper classification.   | Sections 509(a)(1)<br>and 170(b)(1)(A)(vi)<br>or<br>Section 509(a)(2) |

If you checked one of the boxes (a) through (f) in question 9, go to question 14.  
 If you checked box (g) in question 9, go to questions 11 and 12.  
 If you checked box (h), (i), or (j), go to question 10.

**Part III** Technical Requirements (Continued)

- 10** If you checked box (h), (i), or (j) in question 9, have you completed a tax year of at least 8 months?  
 Yes—Indicate whether you are requesting:  
 A definitive ruling (Answer questions 11 through 14.)  
 An advance ruling (Answer questions 11 and 14 and attach 2 Forms 872-C completed and signed.)  
 No—You must request an advance ruling by completing and signing 2 Forms 872-C and attaching them to your application.
- 11** If the organization received any unusual grants during any of the tax years shown in Part IV-A, attach a list for each year showing the name of the contributor; the date and the amount of the grant; and a brief description of the nature of the grant.

**12** If you are requesting a definitive ruling under section 170(b)(1)(A)(iv) or (vi), check here  and:

- a** Enter 2% of line 8, column (e) of Part IV-A \_\_\_\_\_  
**b** Attach a list showing the name and amount contributed by each person (other than a governmental unit or "publicly supported" organization) whose total gifts, grants, contributions, etc., were more than the amount you entered on line 12a above.

**13** If you are requesting a definitive ruling under section 509(a)(2), check here  and:

- a** For each of the years included on lines 1, 2, and 9 of Part IV-A, attach a list showing the name of and amount received from each "disqualified person."  
**b** For each of the years included on line 9 of Part IV-A, attach a list showing the name of and amount received from each payer (other than a "disqualified person") whose payments to the organization were more than \$5,000. For this purpose, "payer" includes, but is not limited to, any organization described in sections 170(b)(1)(A)(i) through (vi) and any governmental agency or bureau.

**14** Indicate if your organization is one of the following. If so, complete the required schedule. (Submit only those schedules that apply to your organization. Do not submit blank schedules.)

	Yes	No	If "Yes," complete Schedule:
Is the organization a church?		X	A
Is the organization, or any part of it, a school?		X	B
Is the organization, or any part of it, a hospital or medical research organization?		X	C
Is the organization a section 509(a)(3) supporting organization?		X	D
Is the organization an operating foundation?		X	E
Is the organization, or any part of it, a home for the aged or handicapped?		X	F
Is the organization, or any part of it, a child care organization?		X	G
Does the organization provide or administer any scholarship benefits, student aid, etc.?		X	H
Has the organization taken over, or will it take over, the facilities of a "for profit" institution?		X	I

**Part IV Financial Data**

Complete the financial statements for the current year and for each of the 3 years immediately before it. If in existence less than 4 years, complete the statements for each year in existence. If in existence less than 1 year, also provide proposed budgets for the 2 years following the current year.

**A.—Statement of Revenue and Expenses**

	Current tax year	3 prior tax years or proposed budget for 2 years			(e) TOTAL
	(a) From 8/6/93 to 12/31/93	(b) 1994.....	(c) 1995.....	(d) 19 .....	
<b>Revenue</b>					
1 Gifts, grants, and contributions received (not including unusual grants—see instructions) . . .	1,300,300	1,400,000	1,510,000		4,210,000
2 Membership fees received . . .					
3 Gross investment income (see instructions for definition) . . .	1,000	2,000	3,000		6,000
4 Net income from organization's unrelated business activities not included on line 3 . . . . .					
5 Tax revenues levied for and either paid to or spent on behalf of the organization . . . . .					
6 Value of services or facilities furnished by a governmental unit to the organization without charge (not including the value of services or facilities generally furnished the public without charge) . . . . .					
7 Other income (not including gain or loss from sale of capital assets) (attach schedule) . . .					
8 Total (add lines 1 through 7) . . .					
9 Gross receipts from admissions, sales of merchandise or services, or furnishing of facilities in any activity that is not an unrelated business within the meaning of section 513 . . . . .					
10 Total (add lines 8 and 9) . . . . .	1,301,000	1,402,000	1,513,000		4,216,000
11 Gain or loss from sale of capital assets (attach schedule) . . . . .					
12 Unusual grants . . . . .					
13 Total revenue (add lines 10 through 12) . . . . .	1,301,000	1,402,000	1,513,000		4,216,000
<b>Expenses</b>					
14 Fundraising expenses . . . . .	520,000	572,000	629,250		
15 Contributions, gifts, grants, and similar amounts paid (attach schedule) . . .	730,000	779,000	832,000		
16 Disbursements to or for benefit of members (attach schedule) . . .					
17 Compensation of officers, directors, and trustees (attach schedule) . . . . .					
18 Other salaries and wages . . . . .					
19 Interest . . . . .					
20 Occupancy (rent, utilities, etc.) . . .					
21 Depreciation and depletion . . . . .					
22 Other (attach schedule) . . . . .	50,000	50,000	50,000		
23 Total expenses (add lines 14 through 22) . . . . .	1,300,000	1,401,000	1,511,250		
24 Excess of revenue over expenses (line 13 minus line 23) . . . . .	1,000	1,000	1,750		



**Part IV** Financial Data (Continued)

B.—Balance Sheet (at the end of the period shown)		Current tax year Date <u>12/31/93</u>
<b>Assets</b>		
1	Cash . . . . .	1 501,000
2	Accounts receivable, net (pledges receivable) . . . . .	2 500,000
3	Inventories . . . . .	3
4	Bonds and notes receivable (attach schedule) . . . . .	4
5	Corporate stocks (attach schedule) . . . . .	5
6	Mortgage loans (attach schedule) . . . . .	6
7	Other investments (attach schedule) . . . . .	7
8	Depreciable and depletable assets (attach schedule) . . . . .	8
9	Land . . . . .	9
10	Other assets (attach schedule) . . . . .	10
11	<b>Total assets</b> (add lines 1 through 10) . . . . .	11 1,001,000
<b>Liabilities</b>		
12	Accounts payable . . . . .	12 270,000
13	Contributions, gifts, grants, etc., payable . . . . .	13 730,000
14	Mortgages and notes payable (attach schedule) . . . . .	14
15	Other liabilities (attach schedule) . . . . .	15
16	<b>Total liabilities</b> (add lines 12 through 15) . . . . .	16 1,000,000
<b>Fund Balances or Net Assets</b>		
17	<b>Total fund balances or net assets</b> . . . . .	17 1,000
18	<b>Total liabilities and fund balances or net assets</b> (add line 16 and line 17) . . . . .	18 1,001,000
If there has been any substantial change in any aspect of your financial activities since the end of the period shown above, check the box and attach a detailed explanation . . . . .		<input type="checkbox"/>

**Schedule A.—Churches**

**1** Provide a brief history of the development of the organization, including the reasons for its formation.

**2** Does the organization have a written creed or statement of faith?  Yes  No  
If "Yes," attach a copy.

**3** Does the organization require prospective members to renounce other religious beliefs or their membership in other churches or religious orders to become members?  Yes  No

**4** Does the organization have a formal code of doctrine and discipline for its members?  Yes  No  
If "Yes," describe.

**5** Describe your form of worship and attach a schedule of your worship services.

**6** Are your services open to the public?  Yes  No  
If "Yes," describe how you publicize your services and explain your criteria for admittance.

**7** Explain how you attract new members.

**8 (a)** How many active members are currently enrolled in your church?

**(b)** What is the average attendance at your worship services?

**9** In addition to your worship services, what other religious services (such as baptisms, weddings, funerals, etc.) do you conduct?

Schedule A.—Churches (Continued)

10 Does the organization have a school for the religious instruction of the young?  Yes  No

11 Were your current deacons, minister, and pastor formally ordained after a prescribed course of study?  Yes  No

12 Describe your religious hierarchy or ecclesiastical government.

13 Does your organization have an established place of worship?  Yes  No

If "Yes," provide the name and address of the owner or lessor of the property and the address and a description of the facility.

If you have no regular place of worship, state where your services are held and how the site is selected.

14 Does (or will) the organization license or otherwise ordain ministers (or their equivalent) or issue church charters?  Yes  No

If "Yes," describe in detail the requirements and qualifications needed to be so licensed, ordained, or chartered.

15 Did the organization pay a fee for a church charter?  Yes  No

If "Yes," state the name and address of the organization to which the fee was paid, attach a copy of the charter, and describe the circumstances surrounding the chartering.

16 Show how many hours a week your minister/pastor and officers each devote to church work and the amount of compensation paid each of them. If your minister or pastor is otherwise employed, indicate by whom employed, the nature of the employment, and the hours devoted to that employment.

## Schedule A.—Churches (Continued)

- 17 Will any funds or property of your organization be used by any officer, director, employee, minister, or pastor for his or her personal needs or convenience?  Yes  No

If "Yes," describe the nature and circumstances of such use.

- 18 List any officers, directors, or trustees related by blood or marriage.

- 19 Give the name of anyone who has assigned income to you or made substantial contributions of money or other property. Specify the amounts involved.

### Instructions

Although a church, its integrated auxiliaries, or a convention or association of churches is not required to file Form 1023 to be exempt from Federal income tax or to receive tax deductible contributions, such an organization may find it advantageous to obtain recognition of exemption. In this event, you should submit information showing that your organization is a church, synagogue, association or convention of churches, religious order or religious organization that is an integral part of a church, and that it is carrying out the functions of a church.

In determining whether an admittedly religious organization is also a church, the Internal Revenue Service does not accept any and every assertion that such an organization is a church. Because beliefs and practices vary so widely, there is no single definition of the word "church" for tax purposes. The Internal Revenue Service considers the facts and circumstances of each organization applying for church status.

The Internal Revenue Service maintains two basic guidelines in determining that an organization meets the religious purposes test:

- (a) that the particular religious beliefs of the organization are truly and sincerely held, and

- (b) that the practices and rituals associated with the organization's religious beliefs or creed are not illegal or contrary to clearly defined public policy.

In order for the Internal Revenue Service to properly evaluate your organization's activities and religious purposes, it is important that all questions in this Schedule are answered accurately.

The information submitted with this Schedule will be a determining factor in granting the "church" status requested by your organization. In completing the Schedule, the following points should be considered:

- (a) The organization's activities in furtherance of its beliefs must be exclusively religious.
- (b) An organization will not qualify for exemption if it has a substantial nonexempt purpose of serving the private interests of its founder or the founder's family.

### Schedule B.—Schools, Colleges, and Universities

**1** Does, or will, the organization normally have: (a) a regularly scheduled curriculum, (b) a regular faculty of qualified teachers, (c) a regularly enrolled body of students, and (d) facilities where its educational activities are regularly carried on?  Yes  No  
 If "No," do not complete the rest of this Schedule.

**2** Is the organization an instrumentality of a State or political subdivision of a State?  Yes  No  
 If "Yes," document this in Part II and do not complete items 3 through 10 of this Schedule. (See instructions for Schedule B.)

**3** Does or will the organization (or any department or division within it) discriminate in any way on the basis of race with respect to:

<b>a</b> Admissions?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>b</b> Use of facilities or exercise of student privileges?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>c</b> Faculty or administrative staff?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>d</b> Scholarship or loan programs?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If "Yes" for any of the above, explain.

**4** Does the organization include a statement in its charter, bylaws, or other governing instrument, or in a resolution of its governing body, that it has a racially nondiscriminatory policy as to students?  Yes  No  
 Attach whatever corporate resolutions or other official statements the organization has made on this subject.

**5a** Has the organization made its racially nondiscriminatory policies known in a manner that brings the policies to the attention of all segments of the general community that it serves?  Yes  No  
 If "Yes," describe how these policies have been publicized and how often relevant notices or announcements have been made. If no newspaper or broadcast media notices have been used, explain.

**b** If applicable, attach clippings of any relevant newspaper notices or advertising, or copies of tapes or scripts used for media broadcasts. Also attach copies of brochures and catalogues dealing with student admissions, programs, and scholarships, as well as representative copies of all written advertising used as a means of informing prospective students of your programs.

**6** Attach a numerical schedule showing the racial composition, as of the current academic year, and projected as far as may be feasible for the next academic year, of: (a) the student body, and (b) the faculty and administrative staff

**7** Attach a list showing the amount of any scholarship and loan funds awarded to students enrolled and the racial composition of the students who have received the awards.

**8a** Attach a list of the organization's incorporators, founders, board members, and donors of land or buildings, whether individuals or organizations.

**b** State whether any of the organizations listed in 8a have as an objective the maintenance of segregated public or private school education, and, if so, whether any of the individuals listed in 8a are officers or active members of such organizations.

**9a** Indicate the public school district and county in which the organization is located.

**b** Was the organization formed or substantially expanded at the time of public school desegregation in the above district or county?  Yes  No

**10** Has the organization ever been determined by a State or Federal administrative agency or judicial body to be racially discriminatory?  Yes  No

If "Yes," attach a detailed explanation identifying the parties to the suit, the forum in which the case was heard, the cause of action, the holding in the case, and the citations (if any) for the case. Also describe in detail what changes in your operation, if any, have occurred since then.

## Instructions

A "school" is an organization that has the primary function of presenting formal instruction, normally maintains a regular faculty and curriculum, normally has a regularly enrolled body of students, and has a place where its educational activities are carried on. The term generally corresponds to the definition of an "educational organization" in section 170(b)(1)(A)(ii). Thus, the term includes primary, secondary, preparatory and high schools, and colleges and universities. The term does not include organizations engaged in both educational and non-educational activities unless the latter are merely incidental to the educational activities. A school for handicapped children would be included within the term, but an organization merely providing handicapped children with custodial care would not.

For purposes of this Schedule, "Sunday schools" that are conducted by a church would not be included in the term "schools," but separately organized schools (such as parochial schools, universities, and similar institutions) would be included in the term.

A private school that otherwise meets the requirements of section 501(c)(3) as an educational institution will not qualify for exemption under section 501(a) unless it has a racially nondiscriminatory policy as to students. This policy means that the school admits students of any race to all the rights, privileges, programs, and activities generally accorded or made available to students at that school, and that the school does not discriminate on the basis of race in the administration of its educational policies, admissions

policies, scholarship and loan programs, and athletic, or other school-administered programs. The Internal Revenue Service considers discrimination on the basis of race to include discrimination on the basis of color and national or ethnic origin. A policy of a school that favors racial minority groups in admissions, facilities, programs, and financial assistance will not constitute discrimination on the basis of race when the purpose and effect is to promote the establishment and maintenance of that school's racially nondiscriminatory policy as to students. See Rev. Proc. 75-50, 1975-2 C.B. 587, for guidelines and recordkeeping requirements for determining whether private schools that are applying for recognition of exemption have racially nondiscriminatory policies as to students.

**Line 2.**—An instrumentality of a State or political subdivision of a State may qualify under section 501(c)(3) if it is organized as a separate entity from the governmental unit that created it and if it otherwise meets the organizational and operational tests of section 501(c)(3). (See Rev. Rul. 60-384, 1960-2 C.B. 172.) Any such organization that is a school is not a private school and, therefore, is not subject to the provisions of Rev. Proc. 75-50.

Schools that incorrectly answer "Yes" to line 2 will be contacted to furnish the information called for by lines 3 through 10 in order to establish that they meet the requirements for exemption. To prevent delay in the processing of your application, be sure to answer line 2 correctly and complete lines 3 through 10 if applicable.

## Schedule C.—Hospitals and Medical Research Organizations

- Check here if you are claiming to be a hospital; complete the questions in Section I of this Schedule; and write "N/A" in Section II.
- Check here if you are claiming to be a medical research organization operated in conjunction with a hospital; complete the questions in Section II of this Schedule; and write "N/A" in Section I.

### Section I Hospitals

- 1a** How many doctors are on the hospital's courtesy staff? \_\_\_\_\_
- b** Are all the doctors in the community eligible for staff privileges?  Yes  No  
If "No," give the reasons why and explain how the courtesy staff is selected.
- 
- 2a** Does the hospital maintain a full-time emergency room?  Yes  No
- b** What is the hospital's policy on administering emergency services to persons without apparent means to pay? \_\_\_\_\_
- 
- c** Does the hospital have any arrangements with police, fire, and voluntary ambulance services for the delivery or admission of emergency cases?  Yes  No  
Explain. \_\_\_\_\_
- 
- 3a** Does or will the hospital require a deposit from persons covered by Medicare or Medicaid in its admission practices?  Yes  No  
If "Yes," explain. \_\_\_\_\_
- b** Does the same deposit requirement apply to all other patients?  Yes  No  
If "No," explain. \_\_\_\_\_
- 
- 4** Does or will the hospital provide for a portion of its services and facilities to be used for charity patients?  Yes  No  
Explain your policy regarding charity cases. Include data on the hospital's past experience in admitting charity patients and arrangements it may have with municipal or government agencies for absorbing the cost of such care. \_\_\_\_\_
- 
- 5** Does or will the hospital carry on a formal program of medical training and research?  Yes  No  
If "Yes," describe. \_\_\_\_\_
- 
- 6** Does the hospital provide office space to physicians carrying on a medical practice?  Yes  No  
If "Yes," attach a list setting forth the name of each physician, the amount of space provided, the annual rent, the expiration date of the current lease and whether the terms of the lease represent fair market value. \_\_\_\_\_

### Section II Medical Research Organizations

- 1** Name the hospitals with which you have a relationship and describe the relationship. \_\_\_\_\_
- 
- 2** Attach a schedule describing your present and proposed (indicate which) medical research activities; show the nature of the activities, and the amount of money that has been or will be spent in carrying them out. (Making grants to other organizations is not direct conduct of medical research.) \_\_\_\_\_
- 
- 3** Attach a statement of assets showing the fair market value of your assets and the portion of the assets directly devoted to medical research. \_\_\_\_\_

For more information, see back of Schedule C.

## Additional Information

**Hospitals.**—To be entitled to status as a "hospital," an organization must have, as its principal purpose or function, the providing of medical or hospital care or medical education or research. "Medical care" includes the treatment of any physical or mental disability or condition, the cost of which may be taken as a deduction under section 213, whether the treatment is performed on an inpatient or outpatient basis. Thus, a rehabilitation institution, outpatient clinic, or community mental health or drug treatment center may be a hospital if its principal function is providing the above described services. On the other hand, a convalescent home or a home for children or the aged would not be a hospital. Similarly, an institution whose principal purpose or function is to train handicapped individuals to pursue some vocation would not be a hospital. Moreover, a medical education or medical research institution is not a hospital, unless it is also actively engaged in providing medical or hospital care to patients on its premises or in its facilities on an inpatient or outpatient basis.

**Cooperative Hospital Service Organizations.**—Cooperative hospital service organizations (section 501(e)) should not complete Schedule C.

**Medical Research Organizations.**—To qualify as a medical research organization, the principal function of the organization must be the direct, continuous and active conduct of medical research in conjunction with a hospital that is described in section 501(c)(3), a Federal hospital, or an instrumentality of a governmental unit referred to in section 170(c)(1). For purposes of section 170(b)(1)(A)(iii) only, the organization must be set up to use the funds it receives in the active conduct of medical research by January 1 of the fifth calendar year after receipt. The arrangement it has with donors to assure use of the funds within the five-year period must be legally enforceable. As used here, "medical research" means investigations, experiments and studies to discover, develop, or verify knowledge relating to the causes, diagnosis, treatment, prevention, or control of the physical or mental diseases and impairments of man. For further information, see Regulations section 1.170A-9(c)(2).



## Schedule D.—Section 509(a)(3) Supporting Organization

1a Organizations supported by the applicant organization: Name and address of supported organization	b. Has the supported organization received a ruling or determination letter that it is not a private foundation by reason of section 509(a)(1) or (2)?
.....	<input type="checkbox"/> Yes <input type="checkbox"/> No
.....	<input type="checkbox"/> Yes <input type="checkbox"/> No
.....	<input type="checkbox"/> Yes <input type="checkbox"/> No
.....	<input type="checkbox"/> Yes <input type="checkbox"/> No
.....	<input type="checkbox"/> Yes <input type="checkbox"/> No

c If "No" for any of the organizations listed in 1a, explain.

**2** Does the organization you support have tax-exempt status under section 501(c)(4), 501(c)(5), or 501(c)(6)?  Yes     No  
 If "Yes," attach: (a) a copy of its ruling or determination letter, and (b) an analysis of its revenue for the current year and the preceding three years. (Provide the financial data using the formats in Part IV-A (lines 1-13) and Part III (questions 11, 12, and 13).)

**3** Does your governing document indicate that the majority of your governing board is elected or appointed by the supported organizations?  Yes     No  
 If "Yes," skip to question 9.  
 If "No," you must answer questions 4 through 9.

**4** Does your governing document indicate the common supervision or control that you and the supported organizations share?  Yes     No  
 If "Yes," give the article and paragraph numbers. If "No," explain.

**5** To what extent do the supported organizations have a significant voice in your investment policies, in the making and timing of grants, and in otherwise directing the use of your income or assets?

**6** Does the mentioning of the supported organizations in your governing instrument make you a trust that the supported organizations can enforce under state law and compel to make an accounting?  Yes     No  
 If "Yes," explain.

**7a** What percentage of your income do you pay to each supported organization?

**b** What is the total annual income of each supported organization?

**c** How much do you contribute annually to each supported organization?

For more information, see back of Schedule D.

## Schedule D.—Section 509(a)(3) Supporting Organization (Continued)

**8** To what extent do you conduct activities that would otherwise be carried on by the supported organizations? Explain why these activities would otherwise be carried on by the supported organizations.

**9** Is the applicant organization controlled directly or indirectly by one or more "disqualified persons" (other than one who is a disqualified person solely because he or she is a manager) or by an organization which is not described in section 509(a)(1) or (2)?  Yes  No  
If "Yes," explain.

### Instructions

For an explanation of the types of organizations defined in section 509(a)(3) as being excluded from the definition of a private foundation, see Publication 557, Chapter 3.

**Line 1.**—List each organization that is supported by your organization and indicate in item 1b if the supported organization has received a letter recognizing exempt status as a section 501(c)(3) public charity as defined in section 509(a)(1) or 509(a)(2).

If you answer "No" in 1b to any of the listed organizations, please explain in 1c.

**Line 3.**—Your governing document may be articles of incorporation, articles of association, constitution, trust indenture, or trust agreement.

**Line 9.**—For a definition of a "disqualified person," see specific instructions for Part II, line 4d, on page 3 of the application's instructions.

## Schedule E.—Private Operating Foundation

Income Test	Most recent tax year
<b>1a</b> Adjusted net income, as defined in Regulations section 53.4942(a)-2(d)	<b>1a</b>
<b>b</b> Minimum investment return, as defined in Regulations section 53.4942(a)-2(c)	<b>1b</b>
<b>2</b> Qualifying distributions:	
<b>a</b> Amounts (including administrative expenses) paid directly for the active conduct of the activities for which organized and operated under section 501(c)(3) (attach schedule)	<b>2a</b>
<b>b</b> Amounts paid to acquire assets to be used (or held for use) directly in carrying out purposes described in section 170(c)(1) or 170(c)(2)(B) (attach schedule)	<b>2b</b>
<b>c</b> Amounts set aside for specific projects that are for purposes described in section 170(c)(1) or 170(c)(2)(B) (attach schedule)	<b>2c</b>
<b>d</b> Total qualifying distributions (add lines 2a, b, and c)	<b>2d</b>
<b>3</b> Percentages:	
<b>a</b> Percentage of qualifying distributions to adjusted net income (divide line 2d by line 1a)	<b>3a</b> %
<b>b</b> Percentage of qualifying distributions to minimum investment return (divide line 2d by line 1b) (Percentage must be at least 85% for 3a or 3b)	<b>3b</b> %
<b>Assets Test</b>	
<b>4</b> Value of organization's assets used in activities that directly carry out the exempt purposes. Do not include assets held merely for investment or production of income (attach schedule)	<b>4</b>
<b>5</b> Value of any stock of a corporation that is controlled by applicant organization and carries out its exempt purposes (attach statement describing corporation)	<b>5</b>
<b>6</b> Value of all qualifying assets (add lines 4 and 5)	<b>6</b>
<b>7</b> Value of applicant organization's total assets	<b>7</b>
<b>8</b> Percentage of qualifying assets to total assets (divide line 6 by line 7—percentage must exceed 65%)	<b>8</b> %
<b>Endowment Test</b>	
<b>9</b> Value of assets not used (or held for use) directly in carrying out exempt purposes:	
<b>a</b> Monthly average of investment securities at fair market value	<b>9a</b>
<b>b</b> Monthly average of cash balances	<b>9b</b>
<b>c</b> Fair market value of all other investment property (attach schedule)	<b>9c</b>
<b>d</b> Total (add lines 9a, b, and c)	<b>9d</b>
<b>10</b> Acquisition indebtedness related to line 9 items (attach schedule)	<b>10</b>
<b>11</b> Balance (subtract line 10 from line 9d)	<b>11</b>
<b>12</b> Multiply line 11 by 3 1/3% (1/3 of the percentage for the minimum investment return computation under section 4942(e)). Line 2d above must equal or exceed the result of this computation	<b>12</b>
<b>Support Test</b>	
<b>13</b> Applicant organization's support as defined in section 509(d)	<b>13</b>
<b>14</b> Gross investment income as defined in section 509(e)	<b>14</b>
<b>15</b> Support for purposes of section 4942(j)(3)(B)(iii) (subtract line 14 from line 13)	<b>15</b>
<b>16</b> Support received from the general public, 5 or more exempt organizations, or a combination of these sources (attach schedule)	<b>16</b>
<b>17</b> For persons (other than exempt organizations) contributing more than 1% of line 15, enter the total amounts that are more than 1% of line 15	<b>17</b>
<b>18</b> Subtract line 17 from line 16	<b>18</b>
<b>19</b> Percentage of total support (divide line 18 by line 15—must be at least 85%)	<b>19</b> %
<b>20</b> Does line 16 include support from an exempt organization that is more than 25% of the amount of line 15?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>21</b> Newly created organizations with less than one year's experience: Attach a statement explaining how the organization is planning to satisfy the requirements of section 4942(j)(3) for the income test and one of the supplemental tests during its first year's operation. Include a description of plans and arrangements, press clippings, public announcements, solicitations for funds, etc.	
<b>22</b> Does the amount entered on line 2a include any grants that you made?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If "Yes," attach a statement explaining how those grants satisfy the criteria for "significant involvement" grants described in section 53.4942(b)-1(b)(2) of the regulations.	

For more information, see back of Schedule E.

## Instructions

If the organization claims to be an operating foundation described in section 4942(j)(3) and—

- (a) bases its claim to private operating foundation status on normal and regular operations over a period of years; or
- (b) is newly created, set up as a private operating foundation, and has at least one year's experience;

provide the information under the income test and under one of the three supplemental tests (assets, endowment, or support). If the organization does not have at least one year's experience, provide the information called for on line 21. If the organization's private operating foundation status depends on its normal and regular operations as described in (a) above, attach a schedule similar to the one shown on the front of this schedule showing the data in tabular form for the three years preceding the most recent tax year. (See Regulations section 53.4942(b)-1 for additional information before completing the "Income Test" section of this schedule.) Organizations claiming section 4942(j)(5) status must satisfy the income test and the endowment test.

A "private operating foundation" described in section 4942(j)(3) is a private foundation that spends substantially all of the lesser of its adjusted net income (as defined below) or its minimum investment return directly for the active conduct of the activities constituting the purpose or function for which it is organized and operated. The foundation must satisfy the income test under section 4942(j)(3)(A), as modified by Regulations section 53.4942(b)-1, and one of the following three supplemental tests: (1) the assets test under section 4942(j)(3)(B)(i); (2) the endowment test under section 4942(j)(3)(B)(ii); or (3) the support test under section 4942(j)(3)(B)(iii).

Certain long-term care facilities described in section 4942(j)(5) are treated as private operating foundations for purposes of section 4942 only.

"Adjusted net income" is the excess of gross income for the tax year over the sum of deductions determined with the modifications described below. Items of gross income from any unrelated trade or business and the deductions directly connected with the unrelated trade or business will be taken into account in computing the organization's adjusted net income:

### Income modifications (adjustments to gross income).—

- (1) Section 103 (relating to interest on certain governmental obligations) does not apply. Thus, interest that otherwise would have been excluded should be included in gross income.
- (2) Except as provided in (3) below, capital gains and losses are taken into account only to the extent of the net short-term gain. Long-term gains and losses will be disregarded.

- (3) The gross amount received from the sale or disposition of certain property should be included in gross income to the extent that the acquisition of the property constituted a qualifying distribution under section 4942(g)(1)(B).
- (4) Repayments of prior qualifying distributions (as defined in section 4942(g)(1)(A)) will constitute items of gross income.
- (5) Any amount set aside under section 4942(g)(2) that is "not necessary for the purposes for which it was set aside" will constitute an item of gross income.

### Deduction modifications (adjustments to deductions).—

- (1) Expenses for the general operation of the organization according to its charitable purposes (as contrasted with expenses for the production or collection of income and management, conservation, or maintenance of income producing property) should not be taken as deductions. If only a portion of the property is used for production of income subject to section 4942 and the remainder is used for general charitable purposes, the expenses connected with that property should be divided according to those purposes and only expenses related to the income producing portion will be allowed as a deduction.
- (2) Charitable contributions, deductible under section 170 or 642(c), should not be taken into account as deductions for adjusted net income.
- (3) The net operating loss deduction prescribed under section 172 should not be taken into account as a deduction for adjusted net income.
- (4) The special deductions for corporations (such as the dividends-received deduction) allowed under sections 241 through 250 should not be taken into account as deductions for adjusted net income.
- (5) Depreciation and depletion should be determined in the same manner as under section 4940(c)(3)(B).

Section 265 (relating to the expenses and interest connected with tax-exempt interest) should not be taken into account.

You may find it easier to figure adjusted net income by completing Column (c), Part 1, Form 990-PF, according to the instructions for that form.

An organization that has been held to be a private operating foundation will continue to be such an organization only if it meets the income test and either the assets, endowment, or support test in later years. See Regulations section 53.4942(b) for additional information. No additional request for ruling will be necessary or appropriate for an organization to maintain its status as a private operating foundation. However, data related to the above tests must be submitted with the organization's annual information return, Form 990-PF.

### Schedule F.—Homes for the Aged or Handicapped

1 What are the requirements for admission to residency? Explain fully and attach promotional literature and application forms.

2 Does or will the home charge an entrance or founder's fee?  Yes  No  
If "Yes," explain and specify the amount charged.

3 What periodic fees or maintenance charges are or will be required of its residents?

4a What established policy does the home have concerning residents who become unable to pay their regular charges?

b What arrangements does the home have or will it make with local and Federal welfare units, sponsoring organizations, or others to absorb all or part of the cost of maintaining those residents?

5 What arrangements does or will the home have to provide for the health needs of its residents?

6 In what way are the home's residential facilities designed to meet some combination of the physical, emotional, recreational, social, religious, and similar needs of the aged or handicapped?

7 Provide a description of the home's facilities and specify both the residential capacity of the home and the current number of residents.

8 Attach a sample copy of the contract or agreement the organization makes with or requires of its residents.

For more information, see back of Schedule F.

## Instructions

- Line 1.**— Provide the criteria for admission to the home and submit brochures, pamphlets, or other printed material used to inform the public about the home's admissions policy.
- Line 2.**— Indicate whether the fee charged is an entrance fee or a monthly charge, etc. Also, if the fee is an entrance fee, is it payable in a lump sum or on an installment basis? If there is no fee, indicate "N/A."
- Line 4.**— Indicate the organization's policy regarding residents who are unable to pay. Also, indicate whether the organization is subsidized for all or part of the cost of maintaining those residents who are unable to pay.
- Line 5.**— Indicate whether the organization provides health care to the residents, either directly or indirectly, through some continuing arrangement with other organizations, facilities, or health personnel. If no health care is provided, indicate "N/A."

### Schedule G.—Child Care Organizations

1 Is the organization's primary activity the providing of care for children away from their homes?  Yes  No

2 How many children is the organization authorized to care for by the State (or local governmental unit), and what was the average attendance during the past 6 months, or the number of months the organization has been in existence if less than 6 months?

3 How many children are currently cared for by the organization?

4 Is substantially all (at least 85%) of the care provided for the purpose of enabling parents to be gainfully employed or to seek employment?  Yes  No

5 Are the services provided available to the general public? If "No," explain.  Yes  No

6 Indicate the category, or categories, of parents whose children are eligible for your child-care services (check as many as apply):

- low income parents
- any working parents (or parents looking for work)
- anyone with the ability to pay
- other (explain)

#### Instructions

Line 5.— If your services are not available to the general public, indicate the particular group or groups that may utilize your services.

REMINDER—If this organization claims to operate a school, then it must also fill out Schedule B.

**Schedule H.—Organizations Providing Scholarship Benefits, Student Aid, Etc., to Individuals**

**1a** Describe the nature and the amount of the scholarship benefit, student aid, etc., including the terms and conditions governing its use, whether a gift or a loan, and how the availability of the scholarship is publicized. If the organization has established or will establish several categories of scholarship benefits, identify each kind of benefit and explain how the organization determines the recipients for each category. Attach a sample copy of any application the organization requires individuals to complete to be considered for scholarship grants, loans, or similar benefits. (Private foundations that make grants for travel, study, or other similar purposes are required to obtain advance approval of scholarship procedures. See Regulations sections 53.4945-4(c) and (d).)

**b** If you want this application considered as a request for approval of grant procedures in the event we determine that you are a private foundation, check here

**c** If you checked the box in 1b above, indicate the sections for which you wish to be considered.

4945(g)(1)

4945(g)(2)

4945(g)(3)

**2** What limitations or restrictions are there on the class of individuals who are eligible recipients? Specifically explain whether there are, or will be, any restrictions or limitations in the selection procedures based upon race or the employment status of the prospective recipient or any relative of the prospective recipient. Also indicate the approximate number of eligible individuals.

**3** Indicate the number of grants you anticipate making annually

**4** If you base your selections in any way on the employment status of the applicant or any relative of the applicant, indicate whether there is or has been any direct or indirect relationship between the members of the selection committee and the employer. Also indicate whether relatives of the members of the selection committee are possible recipients or have been recipients.

**5** Describe any procedures you have for supervising grants (such as obtaining reports or transcripts) that you award, and any procedures you have for taking action if the terms of the grant are violated.

For more information, see back of Schedule H.



### Additional Information

Private foundations that make grants to individuals for travel, study, or other similar purposes are required to obtain advance approval of their grant procedures from the Internal Revenue Service. Such grants that are awarded under selection procedures that have not been approved by the Internal Revenue Service are subject to a 10% excise tax under section 4945. (See Regulations sections 53.4945-4(c) and (d).)

If you are requesting advance approval of your grant procedures, the following sections apply to line 1c:

- 4945(g)(1)— The grant constitutes a scholarship or fellowship grant that meets the provisions of section 117(a) prior to its amendment by the Tax Reform Act of 1986 and is to be used for study at an educational organization (school) described in section 170(b)(1)(A)(ii).
- 4945(g)(2)— The grant constitutes a prize or award that is subject to the provisions of section 74(b), if the recipient of such a prize or award is selected from the general public.
- 4945(g)(3)— The purpose of the grant is to achieve a specific objective, produce a report or other similar product, or improve or enhance a literary, artistic, musical, scientific, teaching, or other similar capacity, skill, or talent of the grantee.

## Schedule I.—Successors to "For Profit" Institutions

**1** What was the name of the predecessor organization and the nature of its activities?

**2** Who were the owners or principal stockholders of the predecessor organization? (If more space is needed, attach schedule.)

Name and address

Share or interest

Name and address	Share or interest

**3** Describe the business or family relationship between the owners or principal stockholders and principal employees of the predecessor organization and the officers, directors, and principal employees of the applicant organization.

**4a** Attach a copy of the agreement of sale or other contract that sets forth the terms and conditions of sale of the predecessor organization or of its assets to the applicant organization.

**b** Attach an appraisal by an independent qualified expert showing the fair market value at the time of sale of the facilities or property interest sold.

**5** Has any property or equipment formerly used by the predecessor organization been rented to the applicant organization or will any such property be rented?  Yes  No  
If "Yes," explain and attach copies of all leases and contracts.

**6** Is the organization leasing or will it lease or otherwise make available any space or equipment to the owners, principal stockholders, or principal employees of the predecessor organization?  Yes  No  
If "Yes," explain and attach a list of these tenants and a copy of the lease for each such tenant.

**7** Were any new operating policies initiated as a result of the transfer of assets from a profit-making organization to a nonprofit organization?  Yes  No  
If "Yes," explain.

### Additional Information

A "for profit" institution for purposes of this Schedule includes any organization in which a person may have a proprietary or partnership interest, hold corporate stock, or otherwise exercise an ownership interest. The institution need not have operated for the purpose of making a profit.

## **Part II, Item 1**

The Breast Cancer Research Foundation, Inc. has as its primary purposes increasing the awareness of the general public with respect to the causes, risks, and treatments of breast cancer, as well as the support of scientific research into such causes, risks and treatments, with an ultimate view toward the reduction, elimination and cure of breast cancer.

As part of the overall effort to accomplish its purposes the Foundation intends to "kick-off" its activities during October, which has been designated "Breast Cancer Awareness Month" by Congressional decree. During this initial phase the Foundation will distribute, free of charge and with no obligation, pink fabric ribbons with accompanying information regarding breast cancer and self-examination techniques. Note that the pink fabric ribbon has been designated a symbol of the breast cancer awareness movement in much the same manner that the red ribbon has been adopted by AIDS awareness groups.

These ribbons will be distributed beginning on October 1, 1993 at more than 2,000 cosmetics counters in stores nationwide which have agreed to participate on a purely voluntary basis with no handling or other fees being charged to the Foundation by the participating distributors. The Foundation's managers feel that distribution at cosmetics counters will reach a large female population due to the appeal of cosmetics to women and the strategic, high-traffic volume location of these counters in department stores. Additionally, pledges will be taken at these counters from individuals wishing to pledge donations of at least \$10.00 to the Foundation. Those individuals making such pledges will also receive a ceramic pink ribbon pin. Note that both the pink ribbons and the pins will qualify as token benefits in accordance with the principles of Rev. Proc. 90-12, 1990-1 CB 471.

Contributions will also be sought from individuals, corporations, foundations, government agencies, etc., in order to fund the Foundation's activities.

The Foundation intends to make donations in order to fund breast cancer research at several prestigious, nationally recognized, tax-exempt hospitals, clinics, medical centers, universities and research organizations throughout the country. Grant applications and proposals will be approved by a committee of physicians, researchers and other concerned and knowledgeable individuals designated by the Board of Directors. Also, a program for breast cancer awareness may be established through the dissemination of information in brochures, newsletters, etc., in addition to the pink ribbon distribution campaign.

**Part II, Item 4d**

{Redacted}

**Part II, Item 8**

The Foundation presently has no assets as it is not yet fully operational. However, it is anticipated that the Foundation's assets for use in its exempt functions will primarily be cash and investments of contributions.

**Part IV, Item A**

**Line 15**

Amounts indicated represent gifts, grants and contributions to qualified tax-exempt organizations

**Line 22**

Amounts indicated represent legal, accounting and other administrative expenses.

**Part II, Item 4a**

**Evelyn H. Lauder, President**  
767 Fifth Avenue  
New Yoek, NY 10153

**Saul H. Magram, Vice President**  
767 Fifth Avenue  
New York, NY 10153

**Deborah Krulewitch, Treasurer/Secretary**  
767 Fifth Avenue  
New York, NY 10153

# Consent Fixing Period of Limitation Upon Assessment of Tax Under Section 4940 of the Internal Revenue Code

(See instructions on reverse side.)

Under section 6501(c)(4) of the Internal Revenue Code, and as part of a request filed with Form 1023 that the organization named below be treated as a publicly supported organization under section 170(b)(1)(A)(vi) or section 509(a)(2) during an advance ruling period,

The Breast Cancer Research Foundation, Inc.

*(Exact legal name of organization as shown in organizing document)*

c/o Larry J. Abowitz - Ernst & Young

787 Seventh Avenue New York, NY 10019

*(Number, street, city or town, state, and ZIP code)*

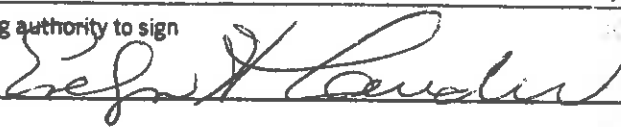
} and the District Director of  
Internal Revenue, or  
Assistant Commissioner  
(Employee Plans and  
Exempt Organizations)

Consent and agree that the period for assessing tax (imposed under section 4940 of the Code) for any of the 5 tax years in the advance ruling period will extend 8 years, 4 months, and 15 days beyond the end of the first tax year.

However, if a notice of deficiency in tax for any of these years is sent to the organization before the period expires, the time for making an assessment will be further extended by the number of days the assessment is prohibited, plus 60 days.

Ending date of first tax year December 31, 1993  
*(Month, day, and year)*

Name of organization (as shown in organizing document) The Breast Cancer Research Foundation, Inc. Date 8-11-93

Officer or trustee having authority to sign  
Signature ▶ 

**For IRS use only**

District Director or Assistant Commissioner (Employee Plans and Exempt Organizations) \_\_\_\_\_ Date \_\_\_\_\_

By ▶ \_\_\_\_\_

**For Paperwork Reduction Act Notice, see page 1 of the Form 1023 Instructions.**

Form **872-C**

(Revised 9-90)  
Department of the Treasury  
Internal Revenue Service

# Consent Fixing Period of Limitation Upon Assessment of Tax Under Section 4940 of the Internal Revenue Code

(See instructions on reverse side.)

OMB No. 1545-0056

To be used with Form  
1023. Submit in  
duplicate.

Under section 6501(c)(4) of the Internal Revenue Code, and as part of a request filed with Form 1023 that the organization named below be treated as a publicly supported organization under section 170(b)(1)(A)(vi) or section 509(a)(2) during an advance ruling period,

The Breast Cancer Research Foundation, Inc.

*(Exact legal name of organization as shown in organizing document)*

c/o Larry J. Abowitz - Ernst & Young

787 Seventh Avenue New York, NY 10019

*(Number, street, city or town, state, and ZIP code)*

} and the District Director of  
Internal Revenue, or  
Assistant Commissioner  
(Employee Plans and  
Exempt Organizations)

Consent and agree that the period for assessing tax (imposed under section 4940 of the Code) for any of the 5 tax years in the advance ruling period will extend 8 years, 4 months, and 15 days beyond the end of the first tax year.

However, if a notice of deficiency in tax for any of these years is sent to the organization before the period expires, the time for making an assessment will be further extended by the number of days the assessment is prohibited, plus 60 days.

Ending date of first tax year December 31, 1993  
*(Month, day, and year)*

Name of organization (as shown in organizing document)  
The Breast Cancer Research Foundation, Inc. Date  
8-11-93

Officer or trustee having authority to sign  
Signature ▶ *E. J. Hander*

For IRS use only  
District Director or Assistant Commissioner (Employee Plans and Exempt Organizations) Date

By ▶  
For Paperwork Reduction Act Notice, see page 1 of the Form 1023 Instructions.

The undersigned, *EVELYN LAUDER*, hereby states the following:

1. I am a duly authorized officer of The Breast Cancer Research Foundation, Inc.
2. The attached copies of the Articles of Incorporation and Bylaws of The Breast Cancer research Foundation, Inc. are true, correct and complete copies of the originals of such documents.
3. The original Articles of Incorporation of The Breast Cancer Research Foundation, Inc. were filed with the Secretary of State of New York and approved on August 6, 1993.

*Evelyn Lauder*

8-11-93 PRESIDENT