

Internal Revenue Service
District Director

Department of the Treasury

Date:

Our Letter Dated:

December 1, 1978

Person to Contact:

Geraldine Carroll

Contact Telephone Number:

404/221-4516

File No. 687600922

ATL EO:1978.

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American Civil Liberties Union Foundation of
Tennessee, Inc.
81 Madison Building
Suite 1501
Memphis, Tennessee 38103

This modifies our letter of the above date in which we stated that you would be treated as an organization which is not a private foundation until the expiration of your advance ruling period.

Based on the information you submitted, we have determined that you are not a private foundation within the meaning of section 509(a) of the Internal Revenue Code, because you are an organization of the type described in section 509(a)(2). Your exempt status under section 501(c)(3) of the code is still in effect.

Grantors and contributors may rely on this determination until the Internal Revenue Service publishes notice to the contrary. However, a grantor or a contributor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act that resulted in your loss of section 509(a)(2) status, or acquired knowledge that the Internal Revenue Service had given notice that you would be removed from classification as a section 509(a)(2) organization.

Because this letter could help resolve any questions about your private foundation status, please keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown above.

Sincerely yours,

Thomas P. Schuch

Exempt Organization Specialist

Your classification as an organization which is not a private foundation is being changed from sections 170(b)(1)(A)(vi) and 509(a)(1) to section 509(a)(2) because the support you have received is the type described in section 509(a)(2).

cc: Bruce S. Kramer

P. O. Box 632, Atlanta, Georgia 30301

Letter 1050 (DO) (7-77)