U. S. TREASURY DEPARTMENT
INTERNAL REVENUE SERVICE
WASHINGTON 25, D. C.

IN REPLY REFER TO
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APR 2 1964

The Brethren Church
524 College Avenue
Ashland, Ohio

Gentlemen:

We have considered the information submitted for use in determining your status and that of your member churches for Federal income tax purposes.

Based upon the evidence presented, it is held that you and your member churches appearing on the list submitted with your letter of March 17, 1964, are exempt from Federal income tax as organizations described in section 501(c)(3) of the Internal Revenue Code of 1954 as it is shown that you and your member churches are organized and operated exclusively for religious purposes. Any questions concerning excise, employment or other Federal taxes should be submitted to the appropriate District Director.

Accordingly, you and your listed member churches are not required to file Federal income tax returns so long as you and your listed member churches retain an exempt status.

It will not be necessary for you and your listed member churches to file the annual return of information, Form 990-A, generally required of organizations exempt under section 501(c)(3) of the Code, as you and your listed member churches come within the specific exceptions contained in section 6033(a) of the Code.

Contributions made to you and your listed member churches are deductible by donors as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to or for your use or the use of the listed member churches are deductible for Federal estate and gift tax purposes as provided in sections 2055, 2106, and 2522 of the Code.

The Brethren Church

You and your listed member churches are not liable for the taxes imposed under the Federal Insurance Contributions Act (social security taxes), unless waiver of exemption certificates are, or have been, filed as provided in that Act. Inquiries regarding the waiver of exemption certificate should be addressed to your District Director. You and your listed member churches are not liable for the tax imposed under the Federal Unemployment Tax Act.

Please send us the following information annually not later than 45 days after the close of your annual accounting period:

1. Lists showing the names and mailing addresses of your new member churches and the names and addresses of any churches which have ceased to exist or have changed their names or addresses. The names should be arranged in alphabetical order or, if numerically designated only, in numerical order. In lieu of the lists referred to above you may furnish us with a copy of your published directory. Please send us one copy of the list or directory for this office and one copy for each district in which your member churches are located.

2. A statement signed by one of your principal officers stating whether or not the information upon which your original group ruling was based is applicable in all respects to the new member churches.

3. A statement if, at the close of the year, there were no changes in your roster.

4. A statement of any changes in the character, purposes or method of operation of your organization or those of your member churches.

5. Duplicate copies of amendments to charters or bylaws of your organization or those of any of your member churches.

This ruling does not cover any affiliated organizations organized under the laws of, and operated in, a foreign country, or publishing companies or other corporations primarily engaged in activities ordinarily carried on for profit. If those organizations desire exemption, they should file separate exemption applications with their respective District Directors of Internal Revenue.

You should advise each of your member churches of the exemption and the pertinent provisions of this ruling.

The District Directors concerned are being notified.

Very truly yours,

R. J. Stakem

Acting Chief, Exempt Organizations Branch