



U. S. TREASURY DEPARTMENT
WASHINGTON 25

MAY 23 1955

OFFICE OF
COMMISSIONER OF INTERNAL REVENUE

ADDRESS REPLY TO
COMMISSIONER OF INTERNAL REVENUE
AND REFER TO

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FCB

Oregon Congress of Parents and Teachers
c/o Mrs. Cecil Scott, Treasurer
511 Education Center Building
Portland 4, Oregon

Re: Resdames:

We have considered the information submitted for use in determining your status and that of your subordinate local units for Federal income tax purposes under the provisions of section 501(c)(3) of the Internal Revenue Code of 1954.

It is the opinion of this office, based upon the information presented, that you and your subordinate local units appearing on the list submitted with your letter dated May 10, 1955, are exempt from Federal income tax under the provisions of section 501(c)(3) of the Code of 1954, as it is shown that you and such local units are organized and operated exclusively for educational purposes.

Accordingly, you and your local units referred to above are not required to file income tax returns unless you change the character of your organization, the purposes for which you were organized, or your method of operation, or that of such local units. Any such changes should be reported immediately to the National Office of the Internal Revenue Service in Washington, D. C., in order that their effect upon your exempt status or that of your local units may be determined.

However, you and the local units listed are required to file annually information returns on Form 990A with the District Director of Internal Revenue, Portland, Oregon, so long as the exemption remains in effect. This form may be obtained from the District Director and is required to be filed on or before the fifteenth day of the fifth month following the close of your respective annual accounting periods.

Contributions made to you and to your local units referred to above are deductible by the donors in computing their taxable income in the manner and to the extent provided by section 170 of the Code of 1954.

Bequests, legacies, devises or transfers, to or for your use or to or for the use of the local units listed are deductible in computing the value of the net estate of a decedent for estate tax purposes in the manner and to the extent provided by sections 2055 and 2106(a)(2) of the Code of 1954. Gifts of property to you and to such local units are deductible in computing net gifts for gift tax purposes in the manner and to the extent provided in section 2522 of the Code of 1954.

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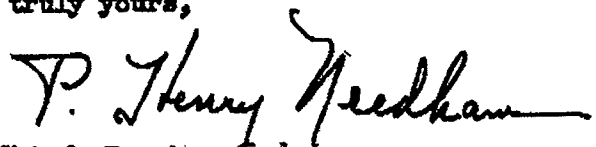
No liability is incurred by you or by your local units referred to above for the taxes imposed under the Federal Insurance Contributions Act (social security taxes) unless you or such local units have filed waiver of exemption certificates in accordance with the applicable provisions of such Act. In the event you or such local units desire social security coverage for your employees or have any questions relating to the filing of waiver of exemption certificates you should take the matter up with the District Director of Internal Revenue.

Your attention is called to the provisions of section 501(c)(3) of the Code of 1954 under which your exemption and that of your subordinate local units will be revoked if any substantial part of your activities, or those of such local units consists of carrying on propaganda, or otherwise attempting, to influence legislation, or if you or your local units participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of any candidate for public office.

You should furnish the National Office annually, on the calendar year basis, lists, in duplicate, showing only the names and addresses of any new subordinate local units chartered by you during the year, and the names and addresses of any local units which for any reason have ceased to exist. These lists should be accompanied by a statement by one of your principal officers as to whether the information heretofore submitted by you, and on which this ruling is based, is applicable in all respects to the new local units appearing on the lists. This information should be forwarded so as to reach the National Office not later than February 15 of the following year.

The District Director of Internal Revenue, Portland, Oregon, is being advised of this action.

Very truly yours,


Chief, Pensions and
Exempt Organizations Branch