



TAX EXEMPT AND
GOVERNMENT ENTITIES
DIVISION

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

Number: **200529008**

Release Date: 07/22/2005

SE:T:EO:RA:T:3

Date: 04/28/05

Index (UIL) No.: 501.15-00

Employer Identification Number:

Form:

Tax Years:

Contact Person:

Identification Number:

Telephone Number:

Dear _____ :

This letter constitutes a final adverse ruling with respect to your claim of exemption from federal income taxation under section 501(c)(15) of the Internal Revenue Code.

We make our ruling for the following reason(s):

Your insurance arrangement involves only one insured. Since there is only one insured, your insurance arrangement does not qualify as insurance for federal income tax purposes because there is no risk distribution. Because the arrangement does not qualify as insurance for federal income tax purposes, you do not qualify as an insurance company for 2003 and 2004.

The Code and the regulations issued thereunder require that you file federal income tax returns. Based upon the financial information that you furnished, you should file returns on the Form and for the tax years indicated above within 30 days from the date of this letter, unless you request and are granted an extension of time to file the returns. You should attach a copy of this letter to the returns you file. Questions concerning the filing of returns should be directed to the Ohio Tax Exempt and Government Entities (TE/GE) office at 877-829-5500 (a toll free number).

This ruling will be made available for public inspection under section 6110 of the Code after certain deletions of identifying information are made. For details, see enclosed Notice 437, *Notice of Intention to Disclose*. A copy of this ruling with deletions that we intend to make available for public inspection is attached to Notice 437. If you disagree with our proposed deletions you should follow the instructions in Notice 437.

If you have any questions concerning the reasons for this ruling, please contact the person whose name and telephone number appear in the heading of this letter.

Sincerely,

Lois G. Lerner
Director, Exempt Organizations
Rulings & Agreements

Enclosure
Notice 437