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Cc: Staley, Jes[REDACTED]
From: Erdoes, Mary E
Sent: Fri 8/26/2011 1:43:38 AM
Subject: In answer to the tax ruling question you asked today

We will need to file an application (a Form 1023) with Treasury/IRS to create and receive approval of tax exempt status for the new organization. While this is a normal application process, we will probably get special scrutiny due to the names involved and the fact that this is likely one of the first 'commercial' DAF applications since the IRS crackdown on perceived DAF abuses and related legislation passed in 2006.

Mary

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