

OFFICE OF COMMISSIONER OF INTERNAL REVENUE
Treasury Department
Washington

May 25, 1936

IT:E:RR
CQ

The First Church of Christ, Scientist,
in Boston, Massachusetts,
107 Falmouth Street,
Boston, Massachusetts.

Sirs:

Reference is made to the evidence furnished by you in support of your claim to exemption from Federal taxation.

It appears that you are organized and operated for religious purposes; that your income is derived from donations, legacies, voluntary contributions, and proceeds from charitable trusts; and that your income is used for general maintenance and operating expenses.

Based on the facts presented, it is held that you are entitled to exemption under the provisions of section 101(6) of the Revenue Act of 1934 and the corresponding provisions of prior revenue acts. You are not, therefore, required to file returns for 1935 and prior years. Returns for subsequent years will not be required so long as there is no change in your organization, your purposes or your method of operation.

Any changes in your form of organization or method of operation, as shown by the evidence submitted, must be immediately reported by you to the collector of internal revenue for your district in order that the effect of such changes upon your present exempt status may be determined.

The exemption granted in this letter does not apply to taxes levied under other titles or provisions of the respective revenue acts, except insofar as exemption is granted expressly under those provisions to organizations enumerated in section 101 of the Revenue Act of 1934 and the corresponding sections of prior revenue acts.

Contributions to your organization by individual donors are deductible by such individuals in arriving at their taxable net income in the manner and to the extent provided by section 23(o) of the Revenue Act of 1934 and the corresponding provisions of prior revenue acts. The deductibility of contributions by corporations is governed by sections 102 and 107 of the Revenue Act of 1935.

It is also held that you are exempt from the payment of the excise tax imposed by section 901 of the Social Security Act, approved August 14, 1935, inasmuch as you come within the exception provided in section 907(c)(7) of that Act.

A copy of this letter is being transmitted to the collector of internal revenue for your district.

The question as to whether you are exempt from payment of the capital stock tax will be made the subject of a separate communication.

By direction of the Commissioner,
Respectfully,

CHAS. T. RUSSELL, Deputy Commissioner.