

GRAYSTONE SOCIETY INC 50 SOUTH FIRST AVENUE COATESVILLE, PA 19320 Date:
07/29/2025
Employer ID number:
22-2601403
Document locator number (DLN):
26053402011745
60-month period begins:
January 1, 2025
60-month period ends:
December 31, 2029
Addendum applies:
No

Person to contact: Name: Mrs. Balla ID number: 5178563 Telephone: 877-829-5500

## Dear Applicant:

We received your notification of intent to terminate your private foundation status under Internal Revenue Code (IRC) Section 507(b)(1)(B) during the 60-month period listed at the top of this letter. This letter could help resolve questions on your foundation status. Please keep it for your records.

You intend to operate as a public charity described in IRC Section(s) 170(b)(1)(A)(vi) during the 60-month period. Based on your proposed activities and support, we agree you can terminate your private foundation status, and we'll treat you as a public charity as described in that Section for the 60-month advance ruling period.

Within 90 days after the end of your 60-month period, you must show you've met the requirements as a public charity described in IRC Section 509(a)(1), (2), or (3) for the 60-month period. If you show this, you'll be classified under that Section for all purposes from the beginning of the 60-month period and thereafter, as long as you continue to meet those requirements. Also, if you satisfy the requirements of IRC Section 507(b)(1)(B) at the end of your 60-month period, you won't be subject to the provisions of IRC Section 507(a), (c), or (g). However, if you don't meet these requirements for the 60-month period, you'll be classified as a private foundation for the entire period.

You'll be liable for interest under IRC Section 6601 if you don't pay the tax imposed by Section 4940 for any taxable years during the 60-month period and we subsequently determine you owe the tax for such years. However, we won't charge the penalty under Section 6651, with respect to the tax imposed by Section 4940, because failure to pay such taxes during the 60-month period is due to reasonable cause.

You're required to file Form 990-PF, Return of Private Foundation or Section 4947(a)(1) Trust Treated as Private Foundation, until you complete your 60-month termination and are classified as a public charity.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

Grantors and contributors can rely on this determination that you're not a private foundation until 90 days after the end of your advance ruling period. If you submit the required information within the 90 days, they can continue to rely on this letter until we make a final determination of your foundation status.

Sincerely,

Stephen A. Martin

Director, Exempt Organizations

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**Rulings and Agreements** 

Form 872-B

Opportunist of the Treasury - Informit Revenue Service

## Consent to Extend the Time to Assess

In reply refer to 

رآيجية فيحمد فكتري Miscellaneous Excise Taxes 22-2601401 GRAYSTONE SOCIETY, INC ((Vanio(s)) of 50 SOUTH FIRST AVENUE, COATESVILLE, FA 19320 Wumber, Street, City or Town, State, ZIP Code) Commissioner of Internal Revenue consent and agree to the following: (1) The amount of liability for investment excise CHAPTER 42 EXCISE tax, imposed on the taxpayer(s) by \_ of the Internal Revenue Code due for the period January 1, 2025 through section 4940 (Intornal Rovanua Code, Revenue Act, etc.) December 31, 2029 May 15, 2030 \_\_ may be assessed at any time on or before \_ (Explration date) (2) The collection provisions and limitations now in effect will also apply to any tax assessed within the extended period (3) The laxpayer(s) may file a claim for credit or refund and the Service may credit or refund the tax within 6 months after this agreement ends. Your Rights as a Taxpayer You have the right to refuse to extend the period of limitations or limit this extension to a mutually agreed-upon issue(s) or mutually agreed-upon period of time. Publication 1035, Extending the Tax Assessment Period, provides a more detailed explanation of your rights and the consequences of the choices you may make. It you have not already received a Publication 103b, the publication can be obtained, free of charge, from the IRS official who requested that you sign this consent or from the IRS web site at <a href="https://www.irs.gov">www.irs.gov</a> or by calling toll free at 1-800-829-3676. Signing this consent will not deprive you of any appeal rights to which you would otherwise be entitled YOUR SIGNATURE HERE -(Date signed) are within \$1.41 have the ceptal in refuse to sign this consult or to brit the extension to mutually agreed upon issues and/or period of time as set forth in 1.8.0 \$ 6501(2)(4)(B). TAXPAYER'S REPRESENTATIVE SIGN HERE ---(Date stoned) Lain www trial Lleve line light to cross to sign this consent or to Bold line extersion to including agreed-upoit issues and/or period of three as set forth in 1.R.C. § ESC 16 (1977) In addition, the tempsycrist has been more record of these rights CORPORATE CORPORATE OFFICER(S) SIGN HERE (Untersions et I (wo) am aware that I (wo) thave the right to refuse to signitive consent of to find the extension to medically agreed-types issues and/or period of time as set from in the C S SSU1(cys)(b). INTERNAL REVENUE SERVICE SIGNATURE AND TITLE (Division Executive Name -(Division Executive Title - see Instructions)

**B** (

(Authorized Official Signature and Title - see instructions)