

1. 12/16/1987: Original Article of Incorporation filed
2. 1/13/1988: Charter Received
3. 2/5/1990: AOI rejected by IRS, need amendment of AOI
4. 2/25/1990: Revised AOI to comply with IRS regulations for tax exempt status
5. 3/4/1990: Letter of clarification to SCC (they messed up).
6. 4/4/1990: 2<sup>nd</sup> filing of AOI because of SCC mess up
7. 4/11/1990: Another filing of amended AI *SCC Rejection*
8. 4/13/1990: Certificate of amendment issued by SCC.
9. 5/3/1990: Application for tax exempt status to IRS
10. 6/7/1990: Receipt of IRS exemption status: 501 (c) (07)
- 11.

4/6



Jerry E. Long  
351 Club View Drive  
Great Falls, VA 22066

The Clerk  
Commonwealth of Virginia  
State Corporation Commission  
P.O. Box 1197  
1220 Bank Street  
Richmond, VA 23209

RE: ARTICLES OF INCORPORATION - RESTON R/C CLUB

Dear Sir or Madam:

Enclosed please find for your review and processing of a Certificate of Incorporation, the Articles of Incorporation of Reston Radio Control Club, Incorporated.

Also enclosed please find two checks as follows:

1. To the State Corporation Commission in the amount of \$70 to cover the Charter Fee (\$50), Filing Fee (\$10) and Recordation Fee.
2. To the Clerk of Court of the County of Fairfax in the amount of \$12 to cover the Recordation Fee (\$10) and Certification Fee (\$2).

When completed, please forward the Charter and other documentation to me at the above address. Should you have any questions, please do not hesitate to call me at (703)556-6148 during business hours.

Very truly yours,



Jerry E. Long  
Registered Agent

JEL/me

Enclosures

12/16/87

16 December 1987

Mr. Jay B. Young  
President,  
Reston R/C Club  
10277 Windgate Court  
Manassas, VA 22110

RE: ARTICLES OF INCORPORATION - RESTON R/C CLUB

Dear Jay,

Enclosed please find five (5) copies of the Club's Articles of Incorporation and two (2) copies of my cover letter (as Registered Agent of the Corporation) to the Clerk of the State Corporation Commission.

Please sign all copies of the Articles and have Bill Boyer do the same. Send one copy of the signed Articles together with one copy of my letter to the Clerk of the Commission down in Richmond. Enclose two checks: 1) to the order of the STATE CORPORATION COMMISSION for \$70; and 2) to the order of CLERK OF COURT, FAIRFAX COUNTY for \$12. (My letter to the Clerk outlines the allocations of these gross amounts.)

Give one copy of the Articles to Bill, keep one for yourself, return one to me and keep one for the Club files along with a copy of my cover letter.

Past experience leads me to conclude that the Charter will take about 4 - 5 weeks (probably a bit longer with the Holidays) to be issued. I will notify you as soon as I get it. We will then be a legal entity and you can then go ahead and sign the lease agreement.

If you have any questions, don't hesitate to call.

Regards,

Jerry E. Long

JEL/me

~~12/16/87~~  
12/16/87

ARTICLES OF INCORPORATION  
OF  
RESTON RADIO CONTROL CLUB, INCORPORATED

We, the Undersigned, do hereby associate to form a non-profit, nonstock corporation under the provisions of Chapter 10 of Title 13.1 of the Code of Virginia (as amended), and, to that end, hereby set forth the following:

ARTICLE I

The name of the corporation is Reston Radio Control Club, Incorporated (hereinafter referred to as the "Club").

ARTICLE II

The purposes for which the Club is organized are as follows:

- A. To promote radio control model aircraft building and flying in the Northern Virginia area for the education, pleasure, recreation and general use of Members in good standing of the Club pursuant to the Constitution and By-Laws of the Club. *replaced.*
- B. To acquire, own, hold, sell, lease, pledge, mortgage or otherwise dispose of any property, real or personal, necessary to the operation of the Club.
- C. To borrow money, contract debts, make contracts or agreements with any domestic or foreign corporations or with any individual or individuals, and to exercise any and all powers as a natural person could lawfully make, do, perform or exercise which may be necessary, convenient or expedient for the accomplishment of any of the objects or purposes hereinbefore mentioned, and to do any other act or acts incidental, appurtenant to, or growing out of the aforesaid purposes providing the same not be inconsistent with the laws of the Commonwealth of Virginia and, to that end, enumeration of such powers shall not be deemed inclusive.

ARTICLE III

The Club shall have only one class of Members. Membership in the Club shall be open to all persons holding a valid license issued by the Academy of Model Aeronautics who have paid the requisite initiation fee, current annual

dues and who have been accepted as Members pursuant to the By-Laws of the Club. Members in good standing shall have equal voting rights.

#### ARTICLE IV

Directors of the Club shall be elected from the general membership of the Club by a vote of the Members pursuant to the By-Laws. The number of Directors and their terms of office shall be established by the By-Laws of the Club. The undersigned Incorporators shall constitute the initial Board of Directors of the Club. Upon receipt of a valid Certificate of Incorporation issued by the Virginia State Corporation Commission authorizing the Club to transact business within the Commonwealth of Virginia, additional Directors and Officers shall be elected by the Members pursuant to the By-Laws.

#### ARTICLE V

The initial Registered Office of the Club shall be located in the County of Fairfax at 351 Club View Drive, Great Falls, Virginia 22066.

#### ARTICLE VI

The initial Registered Agent shall be Jerry E. Long, who is a resident of the Commonwealth of Virginia and an initial Director of the Club, and whose business address and office is identical with that of the Registered Office set forth in Article V.

#### ARTICLE VII

~~The Club shall be organized and operated exclusively for pleasure, recreation, education and other nonprofitable purposes. The Club shall be operated not for profit, and no part of the net earnings of the Club shall inure to the benefit of any Incorporator, Director, Officer, Member or other Individual.~~ *repealed*

*New ART VIII*  
ARTICLE VIII ~~IX~~

The number of Directors constituting the initial Board of Directors shall be three (3). Their names and addresses are as follows:

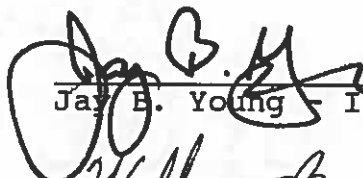
Jay B. Young  
10277 Windgate Court  
Manassas, VA 22110

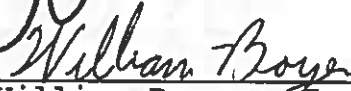
William Boyer  
13130 Penndale Lane  
Fairfax, VA 22033

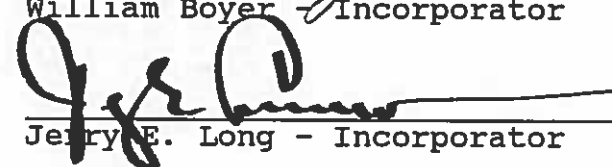
Jerry E. Long  
351 Club View Drive  
Great Falls, VA 22066

NOW, THEREFORE, these Articles of Incorporation are hereby EXECUTED and SIGNED on this the 16<sup>th</sup> day of December, 1987, in the County of Fairfax, Commonwealth of Virginia.

WITNESS our HANDS:

  
Jay B. Young - Incorporator

  
William Boyer - Incorporator

  
Jerry E. Long - Incorporator

1/13/88

# Commonwealth of Virginia



## STATE CORPORATION COMMISSION

*Richmond,* January 13, 1988

*This is to Certify that the certificate of incorporation of*  
RESTON RADIO CONTROL CLUB, INCORPORATED

*was this day issued and admitted to record in this office  
and that the said corporation is authorized to transact its  
business subject to all the laws of the State applicable to the  
corporation and its business.*



*State Corporation Commission*  
*George M. Bryant, Jr.*  
Clerk of the Commission

CIS070

ELIZABETH B. LACY  
CHAIRMAN  
PRESTON C. SHANNON  
COMMISSIONER  
THOMAS P. HARWOOD, JR.  
COMMISSIONER

COMMONWEALTH OF VIRGINIA



GEORGE W. BRYANT, JR.  
CLERK OF THE COMMISSION  
BOX 1197  
RICHMOND, VIRGINIA 23209

STATE CORPORATION COMMISSION

03151115

January 13, 1988

Jerry E. Long  
351 Club View Drive  
Great Falls, VA 22066

Re: RESTON RADIO CONTROL CLUB, INCORPORATED

Dear Sir or Madam:

This is your receipt for \$70.00 covering the fees for filing the Certificate of Incorporation application with this office.

The effective date of the application is January 13, 1988.

Sincerely yours,

George W. Bryant, Jr.  
Clerk of the Commission

01519NEW



Internal Revenue Service  
District Director

Department of the Treasury

2/5/90

*Follow  
8838222  
get FAX #*

31 HOPKINS PLAZA  
BALTIMORE, MD 21201

Date: **FEB - 5 1990**

RESTON RADIO CONTROL CLUB  
INCORPORATED  
P O BOX 5011  
HERNDON, VA 22071

Employer Identification Number:  
54-1322421  
Contact Person:  
MS. J. MANTEGNA  
Contact Telephone Number:  
(301) 962-4787

Response Due Date:  
February 26, 1990

Dear Applicant:

Before we can determine whether your organization is exempt from Federal income tax, we must have enough information to show that you have met all legal requirements. You did not include the information needed to make that determination on your Form 1023, Application for Recognition of Exemption Under Section 501(c)(3) of the Internal Revenue Code.

To help us determine whether your organization is exempt from Federal income tax, please send us the requested information by the above date. We can then complete our review of your application.

If we do not hear from you within that time, we will assume you do not want us to consider the matter further and will close your case. In that event, as required by Code section 6104(c), we will notify the appropriate state officials that, based on the information we have, we cannot recognize you as an organization of the kind described in Code section 501(c)(3). As a result, the Internal Revenue Service will treat your organization as a taxable entity. If we receive the information after the response due date, we may ask you to send us a new Form 1023.

In addition, if you do not provide the requested information in a timely manner, we will consider that you have not taken all reasonable steps to secure the determination you requested. Under Code section 7428(b)(2), your not taking all reasonable steps in a timely manner to secure the determination may be considered as failure to exhaust administrative remedies available to you within the Service. Therefore, you may lose your rights to a declaratory judgment under Code section 7428.

If more than 21 days are necessary to obtain State approval of your amended governing instruments, please contact us to request an extension.

-2-

RESTON RADIO CONTROL CLUB

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Thank you for your cooperation.

Sincerely yours,

A handwritten signature in cursive script that reads "J. Mantegna". The signature is written in dark ink and is positioned above the typed name.

Exempt Organizations Specialist

RESTON RADIO CONTROL CLUB

Please provide the following additional information over the signature of one of your principal officers.

1. To be considered for tax-exempt status under section 501(c)(3), an organization must be both organized and operated exclusively for one or more of the purposes specified in that section. Also, its activities must be restricted to those permitted a section 501(c)(3) organization and its assets in operation and upon dissolution must be permanently dedicated to a section 501(c)(3) purpose.

Your Articles of Incorporation do not meet the organizational test of section 501(c)(3) and therefore, must be amended.

Article II - A This paragraph must be deleted and replaced with the sample language as shown in the enclosure. (See attachment 1)

Article VII This paragraph must be deleted and replaced with the sample language as shown in the enclosure. (See attachment 1)

Your Articles of Incorporation must specify that upon the organization's dissolution its assets must be permanently dedicated to a 501(c)(3) purpose.

A Dissolution Clause (Article) must be added to your Articles of Incorporation. (See attachment 1)

*Internal Revenue Service  
EP/EO Division  
P.O. Box 13163, Room 817  
Balto., Md. 21203  
Attn: J. Mantegna  
EO Group 7204*

501(c)(3) ORGANIZATIONAL TEST

To be considered for tax exempt status under 501(c)(3) an organization must be both "organized and operated exclusively" for one or more of the purposes specified in Section 501(c)(3).

Its activities MUST be restricted to those permitted a 501(c)(3) organization and its assets in operation and upon dissolution MUST be permanently dedicated to a 501(c)(3) purpose.

Your organizational document does NOT meet the organizational test of 501(c)(3) and therefore it MUST be amended.

The paragraphs checked on the reverse side should be adopted by your organization and formally placed by amendment in your organizational document.

1) Since you are INCORPORATED, submit a copy of the Articles of Amendment along with a certificate from the State authorities showing the actual date on which the amendments were approved by the State.

If more than 21 days are necessary to obtain State approval of your amended governing instruments, please contact the person whose name and telephone number are shown in the heading of this letter.

2) Since you are not incorporated, submit the following:

A copy of the amendments to your \_\_\_\_\_ along with a statement signed by at least two members of your governing body certifying that the amendments as submitted are a true, correct and complete copy of the amendments to your organizational document as approved by your membership on \_\_\_\_\_ (month, day and year).

THE FOLLOWING IS SAMPLE LANGUAGE TO BE INCLUDED IN YOUR AMENDED ORGANIZATIONAL DOCUMENT

ARTICLES OF INCORPORATION/ORGANIZATION

*Article II A.*

[✓] THIRD Said corporation/organization is organized exclusively for charitable, religious, educational and scientific purposes, including, for such purposes, the making of distributions to organizations under Section 501(c)(3) of the Internal Revenue Code (or the corresponding section of any future Federal tax code.)

*Article VI*

[✓] FIFTH No part of the net earnings of the corporation/organization shall inure to the benefit of, or be distributable to its members, trustees, directors, officers or other private persons, except that the corporation/organization shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of Section 501(c)(3) purposes. No substantial part of the activities of the corporation/organization shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation/organization shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of, or in opposition to, any candidate for public office.

Notwithstanding any other provision of these articles, the corporation/organization shall not carry on any other activities not permitted to be carried on (a) by a corporation/organization exempt from Federal income tax under Section 501(c)(3) of the Internal Revenue Code (or corresponding section of any future Federal tax code) or (b) by a corporation/organization, contributions to which are deductible under Section 170(c)(2) of the Internal Revenue Code (or corresponding section of any future Federal tax code.)

[✓] SIXTH Upon the dissolution of this corporation/organization assets shall be distributed for one or more exempt purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future Federal tax code, or shall be distributed to the Federal government, or to a state or local government, for a public purpose.

[ ] SEVENTH However, if the named recipient is not then in existence or no longer a qualified distributee, or unwilling or unable to accept the distribution, then the assets of this corporation/organization shall be distributed to a fund, foundation or corporation organized and operated exclusively for the purposes specified in Section 501(c)(3) of the Internal Revenue Code (or corresponding section of any future Federal tax code.)

2/25/90

25th February 1990

(804) 786-3672  
786-3672  
786-3733  
Enquiries

Jerry E. Long  
Registered Agent  
Reston Radio Control  
Club, Inc.  
351 Club View Dr.  
Great Falls, VA 22066

The Clerk  
Commonwealth of Virginia  
State Corporation Commission  
P.O. Box 1197  
1220 Bank Street  
Richmond, VA 23209

RE: AMENDED ARTICLES OF INCORPORATION TO MEET I.R.S. RULES

Dear Sir of Madam:

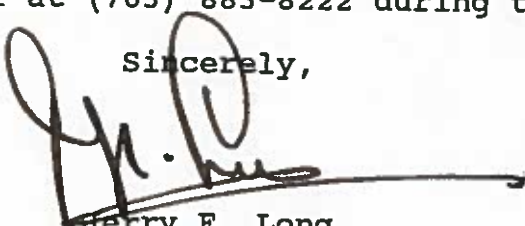
Reston Radio Control Club, Incorporated, a Virginia Corporation, has applied to the Department of the Treasury Internal Revenue Service to be a tax-exempt organization pursuant to Internal Revenue Code Section 501(c)(3). Enclosed you will find a copy of a letter from the Office of the I.R.S. District Director informing us of the necessity to make minor amendments to our original Articles of Incorporation so as to conform to IRC Sec. 501(c)(3), thus enabling us to be tax-exempt.

We have also enclosed a copy of the original Articles of Incorporation as well as a unanimous resolution of the Board of Directors to amend the original Articles to meet IRS requirements.

We must submit a copy of the Articles of Amendment along with a certificate from the Virginia State Corporation Commission showing the actual date on which the amendments were approved. As we have been given an extension to 12 March 1990, it would be appreciated if you could provide us with the appropriately documented approvals prior to that time.

Should you have any questions or comments, please do not hesitate to give me a call at (703) 883-8222 during the day.

Sincerely,



Jerry E. Long  
Registered Agent  
Reston Radio Control Club, Incorporated

2/25/90

Changes BBO.

## ARTICLES OF AMENDMENT OF RESTON RADIO CONTROL CLUB, INC.

### ONE

The name of the Corporation is Reston Radio Control Club, Incorporated.

### TWO

The following Amendments to the Articles of Incorporation of Reston Radio Control Club, Incorporated have been adopted:

Article II-A of the original Articles of Incorporation is to be deleted and replaced with the following language:

\*

#### ARTICLE II

The purposes for which the Club is organized are as follows:

- A. The Club is organized exclusively for charitable, religious, educational and scientific purposes, including, for such purposes, the making of distributions to organizations under Section 501 (c) (3) of the Internal Revenue Code (or the corresponding section of any future Federal tax code) and, in particular, to promote radio control model aircraft building and flying in the Northern Virginia area for the education, pleasure, recreation and general use of Members in good standing of the Club pursuant to the Constitution and By-Laws of the Club.

\*

Article VII of the original Articles of Incorporation is hereby deleted and replaced with the following language:

\*

#### ARTICLE VII

The Club shall be organized and operated exclusively not for profit and no part of the net earnings of the Club shall inure to the benefit of, or be distributable to its Members, trustees, directors, officers or other private persons, except that the Club shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of Section 501 (c) (3) purposes. No substantial part of the activities of the Club shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the Club shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of, or in opposition to, any candidate for public office.

Club shall not carry on any other activities not permitted to be carried on (a) by a corporation/organization exempt from Federal income tax under Section 501 (c)(3) of the Internal Revenue Code (or corresponding section of any future Federal tax code) or (b) by a corporation/organization, contributions to which are deductible under Section 170(c)(2) of the Internal Revenue Code (or corresponding section of any future Federal tax code).

\*

Article VIII of the original Articles of Incorporation is hereby renumbered as Article IX and a new Article VIII<sup>is</sup> added as follows:

\*

#### ARTICLE VIII

Upon dissolution of the Club, assets shall be distributed for one or more exempt purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code (or corresponding section of any future Federal tax code) or shall be distributed to the Federal government, or to a state or local government, for a public purpose.

\*

#### THREE

The foregoing Amendments were adopted on the 25th day of February, 1990.

#### FOUR

The foregoing Amendments were adopted by unanimous vote of the Board of Directors without Member action. Member action was not required for the adoption of the Amendments.

#### FIVE

The undersigned President of Reston Radio Control Club, Incorporated declares that the facts herein stated are true as of the 25th day of February, 1990.

Reston Radio Control Club, Incorporated

By: \_\_\_\_\_



Michael Flaherty, President



2/25/90

*Changes only*

**RESOLUTION**  
**AMENDING ORIGINAL ARTICLES OF INCORPORATION**  
**RESTON RADIO CONTROL CLUB, INCORPORATED**

WHEREAS the Reston Radio Control Club, Incorporated, (the Club, herein) was incorporated in the Commonwealth of Virginia as a non-profit nonstock corporation under the provision of Chapter 10 of Title 13.1 of the Code of Virginia by a Certificate dated January 13, 1988, pursuant to the Articles of Incorporation dated December 16, 1967; and,

WHEREAS the Club has applied to the United States Department of the Treasury Internal Revenue Service for Recognition of Exemption from Federal income tax under Section 501(c)(3) of the Internal Revenue Code; and,

WHEREAS the Office of the District Director of the Internal Revenue Service has officially notified the Club that the original Articles of Incorporation are insufficient for the Club to meet the organizational test of Internal Revenue Code Section 501(c)(3) and has ruled that Article II-A and Article VII of the original Articles of Incorporation must be deleted and replaced with appropriate language and a new Article must be added regarding Club dissolution and the distribution of Club assets in order to meet the requirements of the said Code Section thereby enabling the Club to have a tax-exempt status; and,

WHEREAS the Directors of the Club have taken due note of the said notification; and,

NOW THEREFORE the Directors of the Club have unanimously approved this Resolution and voted to alter and amend the original Articles of Incorporation as follows:

1. Article II-A of the original Articles of Incorporation is hereby deleted and replaced with the following language:

**ARTICLE II**

The purposes for which the Club is organized are as follows:

- A. The Club is organized exclusively for charitable, religious, educational and scientific purposes, including, for such purposes, the making of distributions to organizations under Section 501(c)(3) of the Internal Revenue Code (or the corresponding section of any future Federal tax code) and, in particular, to promote radio control model aircraft building and flying in the Northern Virginia area for the education, pleasure, recreation and general use of Members in good standing of the Club pursuant to the Constitution and By-Laws of the Club.

2. Article VII of the original Articles of Incorporation is hereby deleted and replaced with the following language:

ARTICLE VII

The Club shall be organized and operated exclusively not for profit and no part of the net earnings of Club shall inure to the benefit of, or be distributable to its members, trustees, directors, officers or other private persons, except that the Club shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of Section 501(c)(3) purposes. No substantial part of the activities of the Club shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the Club shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of, or in opposition to, any candidate for public office.


Notwithstanding any other provision of these Articles, the Club shall not carry on any other activities not permitted to be carried on (a) by a corporation/organization exempt from Federal income tax under Section 501(c)(3) of the Internal Revenue Code (or corresponding section of any future Federal tax code) or (b) by a corporation/organization, contributions to which are deductible under Section 170(c)(2) of the Internal Revenue Code (or corresponding section of any future Federal tax code).


3. Article VIII of the original Articles of Incorporation is hereby renumbered as Article IX and a new Article VIII added as follows:

ARTICLE VIII

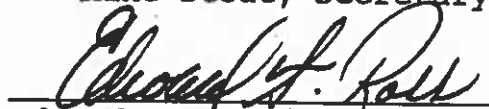
Upon dissolution of the Club, assets shall be distributed for one or more exempt purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future Federal tax code, or shall be distributed to the Federal government, or to a state or local government, for a public purpose.

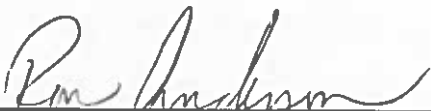
NOW THEREFORE we, the Directors of the Club, have hereunto set our hands and seals signifying our unanimous adoption of this resolution on this the 25th day of February 1990. Done in the County of Fairfax, Commonwealth of Virginia.


  
\_\_\_\_\_  
Michael Flaherty, President

  
\_\_\_\_\_  
Mike Stout, Secretary

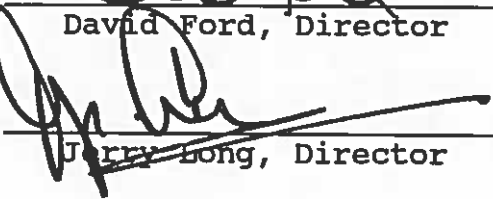
  
\_\_\_\_\_  
Bernie Liebler, Treasurer

  
\_\_\_\_\_  
Edward Ross, Vice President

  
Ron Anderson, Director

  
Thomas Carr, Director

  
David Ford, Director

  
Jerry Long, Director

  
Ewing Board, Director

  
Donald Ferree, Director

  
Chuck Kayser, Director

  
James Ralph, Director

FILE COPY 2/4/90

4th March 1990

Jerry E. Long  
351 Club View Drive  
Great Falls, VA 22066

State Corporation Commission  
Annual Report Section  
Corporate Operations Division  
P.O. Box 1197  
Richmond, VA 23209

RE: RESTON RADIO CONTROL CLUB, INCORPORATED  
ID: 0315111 - 5  
DCN: 90045011

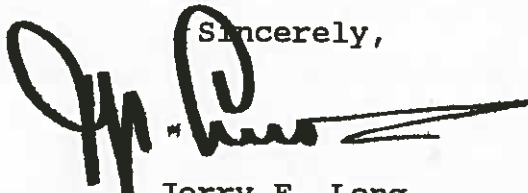
Gentlemen:

Reference is made to your letter of 30th March (copy enclosed) wherein you request certain corrections to Section 7 of our Annual Report.

Upon examining page 2/2 of the Report (Section 7), it would appear that "gremlins" have gotten into your system. That page contains the names of people I never heard of. On closer examination I noted that the DCN number on page 2/2 was different than our DCN number by just one digit. Our DCN number is 090045011 and the DCN number on page 2/2 is 090045012 with a Corporate ID number that is totally different from ours. I would guess, therefore, that the pages simply got switched around in the handling process.

Accordingly, I am returning all of the documents to you for internal correction. If, on further examination of our Annual Report submission, you find that it is somehow flawed, please do not hesitate to let me know.

Sincerely,



Jerry E. Long  
Registered Agent & Director  
Reston Radio Control Club, Incorporated

JEL/me  
Attachments

4/4/90

4th April 1990

Jerry E. Long  
Registered Agent  
Reston Radio Control  
Club, Inc.  
351 Club View Drive  
Great Falls, VA 22066

State Corporation Commission  
Corporate Operations Division  
1220 Bank Street  
Jefferson Building  
Richmond, VA 23219

RE: AMENDED ARTICLES OF INCORPORATION - SECOND FILING

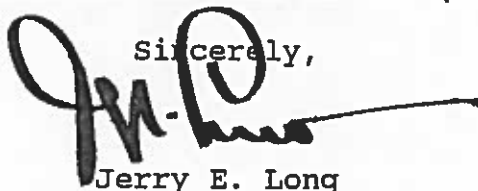
Gentlemen:

On 25th February we sent you a copy of a Unanimous Resolution amending our original Articles of Incorporation. The purpose of the amendment was to satisfy certain requirements of the U.S. Internal Revenue service to qualify as a tax-exempt organization pursuant to I.R.S. Section 501(c)(3).

Today I received a letter from the Annual Report Section, rejecting our most recent Annual Report. Unfortunately, there appears to have been an internal problem there in Richmond. (Two different Annual Reports got switched.) I have sent an explanatory letter (copy enclosed) which will, hopefully, get everything back on track.

When I got the letter regarding our Annual Report, it prompted me to call Richmond regarding the status of our 25th February filing, since we had already gotten two extensions from the IRS and the new deadline is 12th April. The lady I spoke to checked her records and found no indication that anything was ever received. (I now wonder if the same kind of "switch" that occurred with respect to our amended Articles also occurred with the Annual Report.) However, in any case it would appear that the most expeditious thing to do is simply refile everything. Accordingly please find enclosed copies of our original submission along with two checks (\$25 and \$6). We ask that you urgently provide us with a Certificate of Fact that these Amendments were filed and that they have been approved. As noted, the deadline for filing this Certificate with the IRS is 12th April. Anything you can do to expedite the approval process would be greatly appreciated. Should you have any questions, please do not hesitate to call me at: (202) 833-4037.

Sincerely,



Jerry E. Long

4/6/90

# COMMONWEALTH OF VIRGINIA



PRESTON C. SHANNON  
CHAIRMAN  
THEODORE V. MORRISON, JR.  
COMMISSIONER  
THOMAS P. HARWOOD, JR.  
COMMISSIONER

GEORGE W. BRYANT, JR.  
CLERK OF THE COMMISSION  
BOX 1197  
RICHMOND, VIRGINIA 23209  
TDD/VOICE (804) 225-3806

## STATE CORPORATION COMMISSION

April 6, 1990

JERRY E. LONG  
351 CLUB VIEW DRIVE  
GREAT FALLS, VA 22066

RE: RESTON RADIO CONTROL CLUB, INCORPORATED  
ID: 0315111 - 5  
DCN: 90-04-05-0075

We are returning the articles of amendment for the following reasons:

Under the provisions of Section 38.2-1822 of the Code of Virginia, the authority of a corporation to act as an insurance agency or agent must be specifically set forth in its charter.

The articles of amendment as presented are not acceptable for filing. The articles must be drafted in accordance with the provisions of Section 13.1-710 of the Code of Virginia for stock corporations, or Section 13.1-888 of the Code for non-stock corporations. The articles must be executed in accordance with the provisions of Section 13.1-604 of the Code for stock corporations, or Section 13.1-804 for nonstock corporations.

Failure to state that the shareholders (members) approved the amendment, as required by Sections 13.1-707, 13.1-708, and 13.1-710 of the Code of Virginia for stock corporations, or Sections 13.1-886 and 13.1-888 of the Code for nonstock corporations.

A guideform SCC 888 is enclosed for your use.

We have retained the total amount submitted of \$31.00 and will credit it to the required fees when the document is returned and filed.

NOTE: Return this letter with your response to ensure correct document processing and crediting of fees.

Very truly yours,

A handwritten signature in cursive script that reads "Thomas J. Moore". The signature is written in black ink and is positioned above the typed name.

Thomas J. Moore  
Attorney  
(804) 786-3672

AMENREJ  
CIS20304

4/11/90

11th April 1990

Jerry E. Long  
Registered Agent  
Reston Radio Control  
Club, Inc.  
351 Club View Drive  
Great Falls, VA 22066

Mr. Thomas J. Moore  
Attorney  
State Corporation Commission  
Corporate Operations Division  
1220 Bank Street  
Jefferson Building  
Richmond, VA 23219

RE: AMENDED ARTICLES OF INCORPORATION - REDRAFT

Dear Mr. Moore:

Further to your letter of 6th April and our telephone conversation of yesterday, I am pleased to enclosed the Articles of Amendment in a more acceptable form.

We have used guideform SCC 888 to prepare the enclosed Articles of Amendment. As you suggested, I have ignored the reference to "insurance agency" mentioned in your 6th April letter.

I also understand that you have retained the \$31 fees and will credit it now that you have the appropriate document in hand.

Please feel free to call me at (202) 833-4037 should you have any further questions.

I would just like to reiterate that we are faced with an IRS deadline. Accordingly, I would again ask that you give this matter your most urgent consideration and provide us with a Certificate of Fact that these Amendments were filed and that they have been approved.

Sincerely,

Jerry E. Long  
Registered Agent  
Reston Radio Control Club, Incorporated

JEL/me  
Enclosures



4/13/90

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

April 13, 1990

The State Corporation Commission has found the accompanying articles submitted on behalf of

RESTON RADIO CONTROL CLUB, INCORPORATED

to comply with the requirements of law, and confirms payment of all related fees.

Therefore, it is ORDERED that this

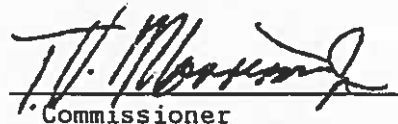
CERTIFICATE OF AMENDMENT

be issued and admitted to record with the articles of amendment in the Office of the Clerk of the Commission, effective April 13, 1990.

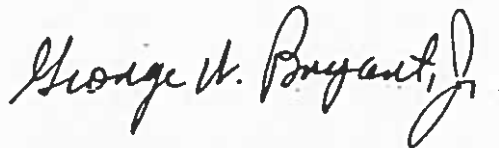
The corporation is granted the authority conferred on it by law in accordance with the articles, subject to the conditions and restrictions imposed by law.

STATE CORPORATION COMMISSION

By

  
Commissioner

A TRUE COPY  
TESTE:



George W. Bryant, Jr.  
Clerk of the Commission

AMENACPT  
CIS20436  
90-04-12-0043

5/3/90

COPY

3rd May 1990

Jerry E. Long  
Registered Agent  
Reston Radio Control  
Club, Incorporated  
351 Club View Drive  
Great Falls, VA 22066

Ms. J. Mantegna  
Exempt Organizations Specialist  
Department of the Treasury  
Internal Revenue Service  
31 Hopkins Plaza  
Baltimore, MD 21201

RE: EMPLOYER IDENTIFICATION NUMBER 54-1322421  
FORM 1024 - APPLICATION FOR RECOGNITION OF  
EXEMPTION AS A SECTION 501 (c) (7) ORGANIZATION

Dear Ms. Mantegna:

Reference is made to our telephone conversation of 25th April and your Memorandum of the same day (copy enclosed).

Enclosed please find a completed Application Form 1024 for exemption under Section 501(c)(7) (Social Club) and the completed Schedule D with appropriate attachments, schedules and so on.

As you discovered and confirmed in our telephone conversation, it appears that one of our predecessor officers, in fact, filed (incorrectly) a Form 1023 for Sec. 501(c)(3) exemption. Obviously, we do not depend on tax-deductible contributions; and, therefore have no need to be a Sec. 501(c)(3) organization. Accordingly, we request withdrawal of that Application and ask that the substitute the Form 1024 Application enclosed. I believe you already have all other relevant documents (including Form 8718 and the appropriate User Fee of \$150).

Hopefully, this will conclude the matter. However, should you have any questions, please do not hesitate to call me at (202) 833-4037.

Sincerely,



Jerry E. Long  
Director & Registered Agent  
Reston Radio Control Club, Incorporated

## Application for Recognition of Exemption Under Section 501(a) or for Determination Under Section 120

OMB No. 1545-0057  
If exempt status is approved, this application will be open for public inspection

Read the instructions for each Part carefully.  
**A User Fee must be attached to this application.**  
If the required information and appropriate documents are not submitted along with Form 8718 (with payment of the appropriate user fee), the application may be returned to you.  
**Complete the Procedural Checklist on page 4 of the instructions.**

**Part I.—Identification of Applicant (Must be completed by all applicants; also complete appropriate Schedule.)**

Check the appropriate box below to indicate the section under which you are applying:

- a  Section 501(c)(2)—Title holding corporations (Schedule A, page 6)
- b  Section 501(c)(4)—Civic leagues, social welfare organizations (including certain war veterans' organizations), or local associations of employees (Schedule B, page 7)
- c  Section 501(c)(5)—Labor, agricultural, or horticultural organizations (Schedule C, page 8)
- d  Section 501(c)(6)—Business leagues, chambers of commerce, etc. (Schedule C, page 8)
- e  Section 501(c)(7)—Social clubs (Schedule D, page 9)
- f  Section 501(c)(8)—Fraternal beneficiary societies, etc., providing life, sick, accident, or other benefits to members (Schedule E, page 11)
- g  Section 501(c)(9)—Voluntary employees' beneficiary associations (Schedule F, page 12)
- h  Section 501(c)(10)—Domestic fraternal societies, orders, etc., not providing life, sick, accident or other benefits (Schedule E, page 11)
- i  Section 501(c)(12)—Benevolent life insurance associations, mutual ditch or irrigation companies, mutual or cooperative telephone companies, or like organizations (Schedule G, page 13)
- j  Section 501(c)(13)—Cemeteries, crematoria, and like corporations (Schedule H, page 14)
- k  Section 501(c)(15)—Mutual insurance companies or associations, other than life or marine (Schedule I, page 15)
- l  Section 501(c)(17)—Trusts providing for the payment of supplemental unemployment compensation benefits (Schedule J, page 16)
- m  Section 501(c)(19)—A post, organization, auxiliary unit, etc., of past or present members of the Armed Forces of the United States (Schedule K, page 17)
- n  Section 501(c)(20)—Trust/organization for prepaid group legal services (Parts I, II, and Schedule M, page 21)
- o  Section 501(c)(25)—Title holding corporations or trusts (Schedule A, page 6)
- p  Section 120—Qualified group legal services plans (Parts I, II, and Schedule L, page 19)

1a Full name of organization (as shown in organizing document) Reston Radio Control Club, Incorporated      2 Employer identification number (if none, see Specific Instructions) 54-1322421

1b c/o Name (if applicable) Jerry E. Long

1c Address (number and street) 351 Club View Drive

1d City or town, county, state, and ZIP code Great Falls, VA 22066

3 Name and telephone number (including area code) of person to be contacted during business hours if more information is needed  
Jerry Long (202) 833-4037

4 Month the annual accounting period ends December

5 Date incorporated or formed 13 January 1988

6 Activity codes (see back cover) 281 | 123 | 603

7 Did the organization apply for recognition of exemption under this Code section or under any other section of the Code?  Yes  No  
If "Yes," attach an explanation.

8 Has the organization filed Federal income tax returns or exempt organization information returns?  Yes  No  
If "Yes," state the form number(s), years filed, and Internal Revenue office where filed.  
Form 990 (1988) IRS-Phila.

9 Check the box for your type of organization. BE SURE TO ATTACH A COMPLETE COPY OF THE CORRESPONDING DOCUMENTS TO THE APPLICATION BEFORE MAILING.

- a  Corporation—Attach a copy of your Articles of Incorporation, (including amendments and restatements) showing approval by the appropriate state official; also attach a copy of your bylaws.
  - b  Trust—Attach a copy of your Trust Indenture or Agreement, including all appropriate signatures and dates.
  - c  Association—Attach a copy of your Articles of Association, Constitution, or other creating document, with a declaration (see instructions) or other evidence that the organization was formed by adoption of the document by more than one person. Include also a copy of your bylaws.
- If you are a corporation or an unincorporated association that has not yet adopted bylaws, check here

PLEASE SIGN HERE  I declare under the penalties of perjury that I am authorized to sign this application on behalf of the above organization, and that I have examined this application, including the accompanying schedules and attachments, and to the best of my knowledge it is true, correct, and complete.

..... (Signature) ..... (Title or authority of signer) ..... (Date)

**FORM 1040**

**RESTON RADIO CONTROL CLUB, INCORPORATED**  
**EMPLOYER ID#: 54-1322421**

**PART I, LINE 7**

A predecessor officer mistakenly filed Form 1023 seeking a Section 501(c)(3) recognition. The filing was made along with Form 8718 along with the appropriate User Fee (\$150).

We now formally request that the Form 1023 Application for exemption under Section 501(c)(3) be withdrawn and that this Form 1024 Application for exemption under Section 501(c)(7) be substituted.

## Part II.—Activities and Operational Information (Must be completed by all applicants)

- 1 Provide a detailed narrative description of all the activities of the organization—past, present, and planned. Do not merely refer to or repeat the language in your organizational document. Describe each activity separately in the order of importance. Each description should include, as a minimum, the following: (a) a detailed description of the activity including its purpose; (b) when the activity was or will be initiated; and (c) where and by whom the activity will be conducted.

Reston R/C is one of Northern Virginia's newest and most progressive radio controlled (R/C) model aircraft clubs. All forms of R/C aeromodelling are encouraged, including fixed-wing power, rotor wing, soaring and electric aircraft. Flight instruction is available to any member through the Club's 3-phase qualification program. This instruction system stresses safety & courtesy in all aspects of the sport/hobby, while ensuring that trainees acquire the skills necessary to properly guide their aircraft.

Club meetings are held the 2nd Tuesday of each month at the Community Christian Church in Herndon, Va. Meetings are open to members and guests and include a short business program, discussion groups, lectures and demonstrations of building techniques. Refreshments and a merchandise raffle are often held.

Reston R/C's expansive, all-grass flying site in Leesburg, VA is open year-round to members and guests. A valid license from the Academy of Model Aeronautics (AMA) in addition to Reston R/C Membership (or Guest) Cards is required of all fliers; and, these must be at hand for verification when engaged in flying activities at the Club field.

(See Attached Field Rules & Management Guide and Official AMA Society Code.)

- 2 List the organization's present and future sources of financial support, beginning with the largest source first.

1. Member Dues / Fees
2. Donations
3. Raffles / Auctions

## Part II.—Activities and Operational Information (continued) (Must be completed by all applicants)

3 The membership of the organization's governing body is: Board of Directors

a Names, addresses, and titles of officers, directors, trustees, etc.	b Annual compensation
1. Ron Anderson (Director) 115 Sue Ann Ct, Sterling, VA 22170 2. Ewing Board (Director) 11753 Mossy Creek Ln., Reston, VA 22091 3. Thomas Carr (Director) 3515 Honey Locust Ct., Fairfax, VA 22030 4. Don Ferrree (Director) 11524 Hickory Cluster, Reston, VA 22090 5. Michael Flaherty (President) 1560 Brownsville Dr., Herndon, VA 22070 6. David Ford (Director) 105 Mayfair Dr. NE, Leesburg, VA 22075 7. Chas. Kayser (Director) 11310 Taffrail Ct., Reston, VA 22091 8. Benam Liebster (Trustee) 10407 Hunter Ridge Ct. Dorton, VA 22124 9. Larry Long (Director/Exec. Off./Registered Agent) 351 Club View Drive, Great Falls, VA 22064 10. James Rahn (Trustee) 13645 Danvers Co., Herndon, VA 22071 11. Edward Ross (VP) 2600 Thomas Young Ln, Herndon, VA 22071 12. Michael Stout (Secy) 10248 Appalachian Cir. #B4, Dorton, VA 22124	<u>Non-Compensated</u>

4 If you are the outgrowth or continuation of any form of predecessor(s), state the name of each predecessor, the period during which it was in existence, and the reasons for its termination. Submit copies of all papers by which any transfer of assets was effected.

N/A

5 If you are now, or plan to be connected in any way with any other organization, describe the organization and explain the relationship (such as: financial support on a continuing basis; shared facilities or employees; same officers, directors, or trustees).

N/A

6 If you have capital stock issued and outstanding, state: (1) class or classes of the stock; (2) number and par value of the shares; (3) consideration for which they were issued; and (4) whether any dividends have been paid or whether your creating instrument authorizes dividend payments on any class of capital stock.

Non-stock

7 State the qualifications necessary for membership in the organization; the classes of membership (with the number of members in each class); and the voting rights and privileges received. If any group or class of persons is required to join, describe the requirement and explain the relationship between those members and members who join voluntarily. Submit copies of any membership solicitation material. Attach sample copies of all types of membership certificates issued.

(A) Be a Member of the Academy of Model Aeronautics (B) Signify a willingness to adhere to all the rules and regulations of the Club. (C) Have paid initiation fee / dues for the current period. (D) Be sponsored by 2 Members in good standing of the Club

8 Explain how your assets will be distributed on dissolution.

Assets shall be distributed for one or more exempt purposes within the meaning of Article 501 (c)(3) of the Internal Revenue Code (or corresponding section of any future Federal Tax Code) or shall be distributed for a public purpose.

**Part II.—Activities and Operational Information (continued) (Must be completed by all applicants)**

9 Have you made or do you plan to make any distribution of your property or surplus funds to shareholders or members?  Yes  No  
 If "Yes," state the full details, including: (1) amounts or value; (2) source of funds or property distributed or to be distributed; and (3) basis of, and authority for, distribution or planned distribution.

10 Does, or will, any part of your receipts represent payments for services performed or to be performed?  Yes  No  
 If "Yes," state in detail the amount received and the character of the services performed or to be performed.

11 Have you made, or do you plan to make, any payments to members or shareholders for services performed or to be performed?  Yes  No  
 If "Yes," state in detail the amount paid, the character of the services, and to whom the payments have been, or will be made.

12 Do you have any arrangement to provide insurance for members, their dependents, or others (including provisions for the payment of sick or death benefits, pensions or annuities)?  Yes  No  
 If "Yes," describe and explain the arrangement's eligibility rules and attach a sample copy of each plan document and each type of policy issued.

13 Are you under the supervisory jurisdiction of any public regulatory body, such as a social welfare agency, etc.?  Yes  No  
 If "Yes," submit copies of all administrative opinions or court decisions regarding this supervision as well as copies of applications or requests for the opinions or decisions.

14 Do you now lease or do you plan to lease any property?  Yes  No  
 If "Yes," explain in detail. Include the amount of rent, a description of the property, and any relationship between your organization and the other party. Also, attach a copy of any rental or lease agreement.

15 Have you spent or do you plan to spend any money attempting to influence the selection, nomination, election or appointment of any person to any Federal, state, or local public office or to an office in a political organization?  Yes  No  
 If "Yes," explain in detail and list the amounts spent or to be spent in each case.

16 Do you publish pamphlets, brochures, newsletters, journals, or similar printed material?  Yes  No  
 If "Yes," attach a recent copy of each.

**Part III.—Financial Data (Must be completed by all applicants)**

Complete the financial statements for the current year and for each of the 3 years immediately before it. If in existence less than 4 years, complete the statements for each year in existence. If in existence less than 1 year, also provide proposed budgets for the 2 years following the current year.

**A—Statement of Revenue and Expenses**

Revenue	(a) Current Tax Year	3 Prior Tax Years or Proposed Budget for 2 Years			(e) Total
	From 1/1/89 To 12/31/89	(b) 19 90	(c) 19 91	(d) 19 —	
1 Gross dues and assessments of members . . . . .	5,410	5,500	5,500		
2 Gross contributions, gifts, etc. . . . .	192	350	350		
3 Gross amounts derived from activities related to the organization's exempt purpose (attach schedule)	547	750	750		
4 Gross amounts from unrelated business activities (attach schedule) . . . . .	—				
5 Gain from sale of assets, excluding inventory items (attach schedule) . . . . .	—				
6 Investment income (see instructions) . . . . .	—				
7 Other revenue (attach schedule) . . . . .	—				
8 Total revenue (add lines 1 through 7) . . . . .	6,149	6,600	6,600		
<b>Expenses</b>					
9 Expenses attributable to activities related to the organization's exempt purposes . . . . .	5,786	6,040	6,350		
10 Expenses attributable to unrelated business activities	—				
11 Contributions, gifts, grants, and similar amounts paid (attach schedule)	—				
12 Disbursements to or for the benefit of members (attach schedule)	—				
13 Compensation of officers, directors, and trustees (attach schedule)	—				
14 Other salaries and wages . . . . .	—				
15 Interest . . . . .	—				
16 Occupancy . . . . .	—				
17 Depreciation and depletion . . . . .	—				
18 Other expenses (attach schedule) . . . . .	—				
19 Total expenses . . . . .	5,786	6,040	6,350		
20 Excess of revenue over expenses (line 8 minus line 19) . . . . .	363	560	250		

**B—Balance Sheet (at the end of the period shown)**

Assets		Current Tax Year as of 12/31/89	
		1	2
1 Cash . . . . .		2405	
2 Accounts receivable, net . . . . .			
3 Inventories . . . . .			
4 Bonds and notes receivable (attach schedule) . . . . .			
5 Corporate stocks . . . . .			
6 Mortgage loans (attach schedule) . . . . .			
7 Other investments (attach schedule) . . . . .			
8 Depreciable and depletable assets (attach schedule) . . . . .			
9 Land . . . . .			
10 Other assets (attach schedule) . . . . .			
11 Total assets . . . . .		2405	
<b>Liabilities</b>			
12 Accounts payable . . . . .		—	
13 Contributions, gifts, grants, etc., payable . . . . .		—	
14 Mortgages and notes payable (attach schedule) . . . . .		—	
15 Other liabilities (attach schedule) . . . . .		—	
16 Total liabilities . . . . .		—	
<b>Fund Balances or Net Assets</b>			
17 Total fund balances or net assets . . . . .		2405	
18 Total liabilities and fund balances or net assets (add line 16 and line 17) . . . . .		2405	

If there has been any substantial change in any aspect of your financial activities since the end of the period shown above, check the box and attach a detailed explanation



**FORM 1040**

**RESTON RADIO CONTROL CLUB, INCORPORATED**  
**EMPLOYER ID#: 54-1322421**

**PART III, A., LINE 3**

3. Gross amounts derived from activities related to the organization's exempt purpose (schedule):

1989

Fun-Fly Raffle (June)	\$303
Fun-Fly Raffle (Sept.)	219
Field Guest Fee	<u>25</u>
TOTAL. . . . .	<u>\$.547</u>

FORM 1040

RESTON RADIO CONTROL CLUB, INCORPORATED  
EMPLOYER ID#: 54-1322421

PART III, A., LINES 1, 2, 3, 8, 9, 19 & 20

REVENUES WITH EXPENSE DETAIL

<u>REVENUE</u>	<u>1990</u>	<u>1991</u>
1. Dues	\$5,500	\$5,500
2. Donations	350	350
3. Misc. Income	<u>750</u>	<u>750</u>
8. Total Revenue	<u>\$6,600</u>	<u>\$6,600</u>

EXPENSES

9. Expenses related to exempt purpose:		
a. Newsletter	\$1,080	\$1,080
b. Postage	435	475
c. Supplies	75	75
d. Field Maint.	1,850	2,000
e. Activities	2,000	2,000
f. Meeting Expense	<u>600</u>	<u>720</u>
19. Total expenses	<u>\$6,040</u>	<u>\$6,350</u>
20. Excess of Revenue over Expenses	<u>\$ 560</u>	<u>\$ 250</u>

**Schedule D** Organizations described in section 501(c)(7) (Social clubs)

1 Have you entered or do you plan to enter into any contract or agreement for the management or operation of your property and/or activities, such as restaurants, pro shops, lodges, etc.?  Yes  No

If "Yes," attach a copy of the contract or agreement. If one has not yet been drawn up, please explain your plans.

2 Do you seek or plan to seek public patronage of your facilities or activities by advertisement or otherwise?  Yes  No

If "Yes," attach sample copies of the advertisements or other requests.

If you plan to seek public patronage, please explain your plans.

3a Are nonmembers, other than guests of members, permitted or will they be permitted to use the club facilities or participate in or attend any functions or activities conducted by the organization?  Yes  No

If "Yes," describe the functions or activities in which there has been or will be nonmember participation or admittance. (Submit a copy of your house rules, if any.)

b	State the amount of nonmember income included in Part III, lines 3 and 4, column (a)	
c	Enter the percent of gross receipts from nonmembers for the use of club facilities	N/A %
d	Enter the percent of gross receipts received from investment income and nonmember use of the club's facilities	%

4a Does your charter, bylaws, other governing instrument, or any written policy statement of your organization contain any provision which provides for discrimination against any person on the basis of race, color, or religion?  Yes  No

b If "Yes," state whether or not its provision will be kept.

c If you have such a provision which will be repealed, deleted, or otherwise stricken from your requirements, state when this will be done N/A

d If you formerly had such a requirement and it no longer applies, give the date it ceased to apply

e If the organization restricts its membership to members of a particular religion, check here and attach the explanation specified in the instructions

See reverse side for instructions

Internal Revenue Service  
District Director

Department of the Treasury

6/7/90

31 HOPKINS PLAZA  
BALTIMORE, MD 21201

Date: JUN 07 1990

RUSTON RADIO CONTROL CLUB  
(INCORPORATED)  
391 CLUB VIEW DRIVE  
GREAT FALLS, VA 22066

Employer Identification Number:  
54-1322421  
Contact Person:  
MS. J. MANTEGNA  
Contact Telephone Number:  
(301) 962-4787

Internal Revenue Code  
Section 501(c)(07)  
Accounting Period Ending:  
December 31  
Form 990 Required:  
Yes  
Amendment Applies:  
Yes

Dear Applicant:

Based on information supplied, and assuming your operations will be as stated in your application for recognition of exemption, we have determined you are exempt from Federal income tax under section 501(a) of the Internal Revenue Code as an organization described in the section indicated above.

Unless specifically excepted, you are liable for taxes under the Federal Insurance Contributions Act (social security taxes) for each employee to whom you pay \$100 or more during a calendar year. And, unless excepted, you are also liable for tax under the Federal Unemployment Tax Act for each employee to whom you pay \$50 or more during a calendar quarter if, during the current or preceding calendar year, you had one or more employees at any time in each of 20 calendar weeks or you paid wages of \$1,500 or more in any calendar quarter. If you have any questions about excise, employment, or other Federal taxes, please address them to this office.

If your sources of support, or your purposes, character, or method of operation change, please let us know so we can consider the effect of the change on your exempt status. In the case of an amendment to your organizational document or bylaws, please send us a copy of the amended document or bylaws. Also, you should inform us of all changes in your name or address.

In the heading of this letter we have indicated whether you must file Form 990, Return of Organization Exempt From Income Tax. If Yes is indicated, you are required to file Form 990 only if your gross receipts each year are normally more than \$25,000. However, if you receive a Form 990 package in the mail, please file the return even if you do not exceed the gross receipts test. If you are not required to file, simply attach the label provided, check the box in the heading to indicate that your annual gross receipts are normally \$25,000 or less, and sign the return.

If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. A penalty of \$10 a day

RESTON RADIO CONTROL CLUB

is charged when a return is filed late, unless there is reasonable cause for the delay. However, the maximum penalty charged cannot exceed \$5,000 or 5 percent of your gross receipts for the year, whichever is less. This penalty may also be charged if a return is not complete, so please be sure your return is complete before you file it.

You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T, Exempt Organization Business Income Tax Return. In this letter we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

You need an employer identification number even if you have no employees. If an employer identification number has not entered on your application, a number will be assigned to you and you will be advised of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

A section 501(c)(7) organization is permitted to receive up to 35 percent of its gross receipts, including investment income, from sources outside of its membership without losing its tax-exempt status. Of the 35 percent, not more than 15 percent of the gross receipts may be derived from the use of the club's facilities or services by the general public. Income in excess of these limits may jeopardize your continued tax-exempt status.

If we have indicated in the heading of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

Because this letter could help resolve any questions about your exempt status, you should keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,

  
District Director

Enclosure:  
Addendum

RESTON RADIO CONTROL CLUB

You are required to make your annual return available for public inspection for three years after the return is due. You are also required to make available a copy of your exemption application, and supporting documents, and the exemption letter. Failure to make these documents available for public inspection may subject you to a penalty of \$10 per day for each day there is a failure to comply (up to a maximum of \$5,000 in the case of an annual return). See Internal Revenue Service Notice 88-120, 1988-2 C.B. 454, for additional information.

Contributions to your organization are not deductible by donors under section 170(c)(2) of the Code. Under section 6113, any fund-raising solicitation (including a solicitation for membership dues payment) you make must include an express statement (in a conspicuous and easily recognizable format) that contributions and gifts are not deductible as charitable contributions for federal income tax purposes. This does not apply, however, if your annual gross receipts are normally \$100,000 or less, or if your solicitations are made to no more than ten persons during the calendar year. The law provides penalties for failure to comply with this requirement, unless the failure is due to reasonable cause. See Internal Revenue Service Notice 88-120, 1988-2 C.B. 451, for additional information.