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Form **8718**

(Rev. October 1990)

Department of the Treasury  
Internal Revenue Service

### User Fee for Exempt Organization Determination Letter Request

▶ **Attach this form to determination letter application.**  
**(Form 8718 is NOT a determination letter application)**

For IRS Use Only

Control number

Amount paid

User fee screener

7500.00  
9743 144  
MGT

1 Name of organization

SCIENTOLOGY MISSIONS INTERNATIONAL

2 Type of request (check only one box and include a check or money order made payable to Internal Revenue Service for the amount of the indicated fee):

Fee

109 027817

- a  Initial request for an exempt organization determination letter (do NOT use for a pension plan determination letter) by an organization whose annual gross receipts have not exceeded (or are not expected to exceed) \$10,000, averaged over the preceding four taxable years, or new organizations which anticipate annual gross receipts averaging not more than \$10,000 during their first four years. If you check this box you must complete the income certification below . . . . .

\$ 150

#### Certification

I hereby certify that the annual gross receipts of \_\_\_\_\_ have not exceeded (or are not expected to exceed) \$10,000, averaged over the preceding four (or the first four) years of operation.  
(enter name of organization)

Signature ▶ \_\_\_\_\_ Title \_\_\_\_\_

- b  Initial request for an exempt organization determination letter (do NOT use for a pension plan determination letter) by an organization whose annual gross receipts have exceeded (or are expected to exceed) \$10,000, averaged over the preceding four taxable years, or a new organization which anticipates annual gross receipts averaging more than \$10,000 during their first four years . . . . .

\$ 375

- c  Private foundation which has completed a section 507 termination and which seeks a determination letter that it is now a public charity . . . . .

\$ 200

- d  Group exemption letters . . . . .

\$ 500

#### Instructions

The Omnibus Budget Reconciliation Act of 1990 requires payment of a user fee for determination letter requests submitted to the Internal Revenue Service. The fee must accompany each request submitted to a key district office.

The fee for each type of request for an exempt organization determination letter is listed in item 2 of this form. Check the block that describes the type of request you are submitting, and attach this form to the front of your request form along with a check or money order for the amount indicated. Make the check or money order payable to the Internal Revenue Service.

Determination letter requests received with no payment or with an insufficient payment will be returned to the applicant for submission of the proper fee. To avoid delays in receiving a determination letter,

be sure that your application is sent to the applicable address shown below. These addresses supersede the addresses listed in Publication 557 and all application forms.

If entity is in this IRS District	Send fee and request for determination letter to this address
Albany, Augusta, Boston, Brooklyn, Buffalo, Burlington, Hartford, Manhattan, Portsmouth, Providence	Internal Revenue Service EP/EO Division P. O. Box 1680, GPO Brooklyn, NY 11202
Baltimore, District of Columbia, Pittsburgh, Richmond, Newark, Philadelphia, Wilmington, any U.S. possession or foreign country	Internal Revenue Service EP/EO Division P. O. Box 17010 Baltimore, MD 21203
Cincinnati, Cleveland, Detroit, Indianapolis, Louisville, Parkersburg	Internal Revenue Service EP/EO Division P. O. Box 3159 Cincinnati, OH 45201

Albuquerque, Austin, Cheyenne, Dallas, Denver, Houston, Oklahoma City, Phoenix, Salt Lake City, Wichita Internal Revenue Service EP/EO Division Mail Code 4950 DAL 1100 Commerce Street Dallas, TX 75242

Atlanta, Birmingham, Columbia, Ft. Lauderdale, Greensboro, Jackson, Jacksonville, Little Rock, Nashville, New Orleans Internal Revenue Service EP/EO Division P. O. Box 941 Atlanta, GA 30370

Anchorage, Boise, Las Vegas, Los Angeles, Honolulu, Portland, Laguna Niguel, San Jose, Seattle Internal Revenue Service EO Application Receiving Room 5127, P. O. Box 486 Los Angeles, CA 90053-0486

Sacramento, San Francisco Internal Revenue Service EO Application Receiving Stop SF 4446 P. O. Box 36002 San Francisco, CA 94102

Aberdeen, Chicago, Des Moines, Fargo, Helena, Milwaukee, Omaha, St. Louis, St. Paul, Springfield Internal Revenue Service EP/EO Division 230 S. Dearborn DPN 20-5 Chicago, IL 60604

Attach Check or Money Order Here



SCIENTOLOGY® MISSIONS INTERNATIONAL

Director, Exempt Organizations  
Technical Division  
1111 Constitution Avenue, N.W.  
Washington D.C. 20224

September 3, 1993

Re: Scientology Missions International  
EIN: 95-3739098  
Request for Group Exemption Ruling Under Sec. 501(c)(3)

Dear Sir,

I am providing you with the following information and materials in support of the accompanying request for a group exemption letter under Code Section 501(c)(3) for Scientology Missions International ("SMI"), as the central organization, and 5 subordinate organizations (the "Subordinate Organizations"), identified on the schedule attached as Exhibit A.

This information is being supplied pursuant to the requirements of section 5 of Revenue Procedure 80-27, 1980-1 C.B. 677 and corresponds to the subsection lettering of section 5.

Section 5.01. SMI's principal office is located in Los Angeles, California and SMI is therefore under the jurisdiction of the Los Angeles, California Key District Director. However, the tax exemptions of SMI and a number of churches of Scientology and related organizations are being considered concurrently at the National Office, so it therefore is appropriate that this request for a group exemption letter be filed directly with the National Office.

Section 5.02. SMI's Employer Identification Number is 95-3739098. SMI's application for exemption (IRS Form 1023) is being considered concurrently with this group exemption request and it is understood that the granting of this request

is conditional upon the granting of SMI's exemption application.

Section 5.031(a). SMI and the Subordinate Organizations to be covered by SMI's group exemption letter have the relationship described in section 4.02 of Revenue Procedure 80-27 for the following reasons:

(1) The Subordinate Organizations are missions of the Scientology religion and are all affiliated with SMI. As the Mother Church for Missions of the Scientology faith, SMI exercises ecclesiastical authority over all missions of Scientology. The Subordinate Organizations share with SMI the same religious faith, religious goals, purposes, policies and doctrines and names. This commonality of faith is the most fundamental unifying feature of SMI and its missions. All subordinate organizations to be included under SMI's group tax exempt status in the future will also be organizations of the Scientology religion and will also share common names, goals, purposes and activities.

(2) The Subordinate Organizations are subject to SMI's ecclesiastical authority as the Mother Church for Missions of the Scientology religion. Scientology is a very exact faith, and a fundamental doctrine of the religion is that its religious services must be orthodox. This doctrine holds that spiritual salvation can be attained if, and only if, the path to salvation outlined in the Scripture's religious technology is followed without deviation. All of the Subordinate Organizations are missions of Scientology that minister basic religious services to their parishioners and conduct training in the Scientology Scriptures for the spiritual enlightenment of their parishioners.

SMI coordinates the activities of the Subordinate Organizations, and as covered more specifically below, monitors and supervises the practice of the faith by the Subordinates to ensure that they do not deviate from orthodox Scientology.

The articles of incorporation of each of the subordinate organizations expressly recognize SMI's ecclesiastical authority (a copy of the articles of incorporation of one Subordinate Organization that is representative of the articles of incorporation of the other Subordinate Organizations, is attached as Exhibit B). SMI has ultimate control over the assets of each Subordinate Organization. The organizing document of each Subordinate Organization provides that on dissolution its assets will be distributed to a section 501(c)(3) organization chosen by SMI, that SMI approve all amendments to its articles of incorporation and bylaws; and that SMI must approve the principal terms of any merger between it and another corporation or any sale or encumbrance of all or substantially all of its assets. (See Articles Eight, Nine, Ten and Eleven of Exhibit B.)

The bylaws of each of the Subordinate Organizations also expressly recognize SMI's overriding authority. Article I of the bylaws requires that their officers, directors and trustees be in good standing with the Mother Church and that:

The Church is and shall be one of the many churches within and without the United States which have been and will be organized for the purposes of the religion of Scientology, all bound together as elements of one international and hierarchical church by voluntary and self determined agreement upon and adherence to the following:

1. The goals, tenets, doctrines, codes, Creed, policies and practices set forth in the Scriptures (as hereafter defined); and
2. Recognition of the ecclesiastical authority of the hierarchy of the Mother Church for Missions; and
3. Governance in ecclesiastical matters by said hierarchy.

The Directors, Officers and agents of the corporation shall be bound by and shall observe the foregoing to the end that the operations and activities of this corporation shall support and maintain the Church as a church of Scientology in good standing with the Mother Church for Missions; subject, however, at all times and in every respect to the paramount requirement of observance of and compliance with all applicable laws, and the provisions of the Articles and of these Bylaws.

(A sample copy of the bylaws of one of the subordinate organizations is attached as Exhibit C).

SMI's ecclesiastical authority is further enhanced by a written covenant between it and Church of Scientology International ("CSI"), the Mother Church of the Scientology religion, with respect to the use of certain religious marks associated with the Scientology religion. Through this covenant CSI has given SMI the right and responsibility to permit missions of the Scientology religion to use the religious marks, which include the marks "Scientology," "Dianetics," and L. Ron Hubbard's name and initials. Without SMI's written authority to use the marks an organization cannot legally use the marks and thus cannot call itself a Scientology mission. These written covenants formalize the relationship of the missions within the hierarchy and create legal rights and duties with respect to the marks that are cognizable in the secular world. Thus, if a mission continues to minister services under the name Scientology despite SMI's objections, SMI is able to stop the practice through the civil judicial system. SMI has full responsibility for supervising

use of the marks by the missions with which it has entered covenants. (A representative copy of the covenant between SMI and one of the Subordinate Organizations is attached as Exhibit D).

SMI's primary function is to coordinate the activities of all missions of Scientology to ensure they are working in harmony toward Scientology's ultimate goal -- "a civilization without insanity, without criminals and without war, where the able can prosper and honest beings can have rights and where Man is free to rise to greater heights." SMI carries out this function by providing ecclesiastical guidance and programmatic support to the Subordinate Organizations. SMI receives reports from and provides advice, ecclesiastical guidance and programs to the Subordinate Organizations to guide them in carrying out their religious activities.

(3) As discussed herein, each of the Subordinate Organizations is a church of the Scientology religion and therefore is exempt under section 501(c)(3) of the Internal Revenue Code because it is organized and operated exclusively for religious purposes.

(4) The Subordinate Organizations are not private foundations. Each is a church within the meanings of sections 509(a)(1) and 170(b)(1)(A)(i) because they have a distinct legal existence, a recognized creed and form of worship, a definite and distinct ecclesiastical government, a formal code of doctrine and discipline, a distinct religious history, a membership generally not associated with any other church or denomination, an organization of ordained ministers, ordained ministers selected after completing prescribed studies, a literature of their own, established places of worship, regular congregations, and regular religious services.

(5) SMI and all Subordinate Organizations have annual accounting periods ending December 31.

(6) As churches, each of the Subordinate Organizations falls under the exception of section 508(c)(1)(A) to the notice requirements of section 508(a).

Section 5.031(b). Attached as Exhibits B and C are representative copies of articles of incorporation and bylaws adopted by the Subordinate Organizations (to the extent allowed by state law, all have adopted uniform governing instruments). Subject to differences in the laws of incorporating states, these same articles and bylaws will be used by organizations to be incorporated in the future that will be included under SMI's group exemption letter.

Section 5.031(c). The purposes and activities of the Subordinate Organizations including the sources of receipts and nature of expenditures are as follows.

Each of the Subordinate Organizations is a church of the Scientology religion. The primary activities of the Subordinate Organizations are ministering the Scientology religious service of auditing to their congregations; proselytizing and disseminating the Scientology faith; providing elementary training in Scientology Scripture for the spiritual enlightenment of their parishioners; and church administration. Each church is separately incorporated with its own congregation. Each adheres to the Scientology Scriptures and follows the Scientology creed (which is set forth in their bylaws) and Scientology policies, codes and system of ethics and justice.

The Subordinate Organizations' sources of funding are almost entirely from fixed donations for religious services (approximately 75%) and for religious books and materials (approximately 20%).

The Subordinate Organizations' expenditures are primarily for operating expenses such as mailings relating to dissemination and proselytization, book stocks, telephone, salaries, rent, utilities and expenses relating to the operation and maintenance of their church premises. These Subordinate Organizations also support SMI's religious program of activities by contributing to SMI a tithe equal to 10% of the contributions they receive for performing Scientology ministerial services.

Section 5.031(d). I affirm that, to the best of my knowledge and belief, the purposes and activities of SMI's Subordinate Organizations are as set forth in paragraphs 5.031(b) and 5.031(c).

Section 5.031(e). Each Subordinate Organization has furnished SMI with written authorization to include it in this application for a group exemption letter. Such authorization was signed by a duly-authorized officer of the particular Subordinate Organization and will be retained by SMI while the group exemption is in effect.

Section 5.031(f). The Internal Revenue Service has not issued a ruling or determination letter relating to the exemption of any of the Subordinate Organizations.

Section 5.031(g). All of the subordinate organizations are churches and fall within the exception in section 508(c)(1)(A) to the notice requirements of section 508(b).

Section 5.031(h). Not applicable.

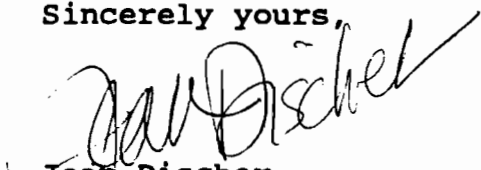
Section 5.032. The names and mailing addresses of the Subordinate Organizations initially to be included in SMI's group exemption letter are listed in Exhibit A.

Section 5.04. SMI's Employer Identification number is 95-3739098.

Section 5.05. Each of the Subordinate Organizations has its own Employer Identification Number.

Thank you for your assistance. We look forward to a favorable ruling on our application.

Sincerely yours,



Jean Discher  
President  
Scientology Missions  
International