

Department of the Treasury

Internal Revenue Service
District Director
P.O.BOX 2350 ROOM 5127 ATTN: E.O.
LOS ANGELES, CA 900532350

Date: JUL 3, 1990

INSTITUTE OF THE AMERICAS
10111 N TORREY PINES RD
LA JOLLA, CA 920370000

Employer Identification Number:
95 3671557
Case Number
95D134DI2
Contact Person:
JOSEPH CUNHA
Contact Telephone Number:
(213) 894-4170

Our Letter Dated:
May 18, 1982
Addendum Applies:
none

Dear Applicant:

This modifies our letter of the above date in which we stated that you would be treated as an organization which is not a private foundation until the expiration of your advance ruling period.

Your exempt status under section 501(a) of the Internal Revenue Code as an organization described in section 501(c)(3) is still in effect. Based on the information you submitted, we have determined that you are not a private foundation within the meaning of section 509(a) of the code because you are an organization of the type described in section 509(a)(1) and 170(b) (1) (A) (vi)

Grantors and contributors may rely on this determination unless the Internal Revenue Service publishes notice to the contrary. However, if you lose your section 509(a)(1) status, a grantor or contributor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act, or the substantial or material change on the part of the organization that resulted in your loss of such status, or if he or she acquired knowledge that the Internal Revenue Service had given notice that you would no longer be classified as a section 509(a)(1) organization.

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

Because this letter could help resolve any questions about your private foundation status, please keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown above.

Sincerely yours



DISTRICT DIRECTOR

Letter 1050(CG)