Dear Agent Ranney:

In response to your correspondence of June 15:

1. Enclosed is a copy of the letter we received from the IRS in July 2000 (note that it is incorrectly dated) about our 501(c)(7) status. The club was not a 501(c)(7) from its inception – but received that status in 1968. I have previously supplied that determination letter. To reiterate what I said in my last letter about our 501(c)(7) status:

   We held the exemption until May 1999 – when we agreed with the IRS to revocation of the status. While this may have been, in retrospect, a mistake, it seemed to us at the time that the work involved in continuing this status wasn’t worth the reward – and that a 501(c)(3) status is more appropriate for our organization. We had not properly separated our bar and bonspiel income between members and non-members. We probably could have documented that more than 98% of the bar income and 90% of the bonspiel income was from members – but given that we had not shown a profit in the previous decade, it didn’t seem worth the effort.

2. Fee info

   a. We charge league fees to members to play in leagues – in that way the fees members pay are more closely related to actual usage. Leagues fees are $100-$130 per league per season. Note that leagues are one of the two primary ways we train curlers (the other way is weekend tournaments called bonspiels). The team that won last year’s U. S. mixed championships played in the Sunday night league. The member who skipped (captained) the team that placed third in the U. S. Olympic trials curled in three leagues.
b. Special events are typically national championships such as the National Mixed (2001) or the National Men’s and Women’s (1997). Our club will host the Junior National Championships in 2007.

c. The club owns the building and land where the club is located. The building is used entirely for curling with occasional use for other activities (there hasn’t been any such use in the past two years). We do get a small amount of extra income from parking and a billboard on the lot. I detailed the amounts involved in my last correspondence. All income benefits the club and maintaining curling at the facility.

d. The club owns the land and buildings. There are no classes of membership that have any particular privileges with regard to land or property usage.

As of June, I am no longer President. I am still an officer of the club (Past President) and member of the Board of Trustees. The board has authorized me to act on the club’s behalf with regard to this matter.

Sincerely,

Douglas W. Potter
Past President

encl: IRS Letter dated July 2, 2000