

Application for Recognition of Exemption

Under Section 501(c)(3) of the Internal Revenue Code

To be filed in the Key District for the area in which the organization has its principal office or place of business.

This application, when properly completed, shall constitute the notice required under section 508(a) of the Internal Revenue Code in order that an applicant may be treated as described in section 501(c)(3) of the Code, and the notice under section 508(b) appropriate to an organization claiming not to be a private foundation within the meaning of section 509(a). **(Read the instructions for each part carefully before making any entries.)** The organization must have an organizing instrument (See Part II) before this application may be filed.

Part I—Identification

1 Full name of organization THE WOODLAWN FOUNDATION		2 Employer identification number (If none, attach Form SS-4) ss-4 attached	
3(a) Address (number and street) c/o Thomas M. Quinn, Esq.; 36 West 44th Street		Check here if applying under section: <input type="checkbox"/> 501(e) <input type="checkbox"/> 501(f)	
3(b) City or town, State and ZIP code New York, New York 10036		4 Name and phone number of person to be contacted Thomas M. Quinn (212) 840-7570	
5 Month the annual accounting period ends December	6 Date incorporated or formed Dec. 11, 1978	7 Activity Codes 004	
8(a) Has the organization filed Federal income tax returns? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," state the form number(s), year(s) filed, and Internal Revenue Office where filed ▶			
8(b) Has the organization filed exempt organization information returns? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," state the form number(s), year(s) filed, and Internal Revenue Office where filed ▶			

Part II.—Type of Entity and Organizational Documents (See instructions)

Check the applicable entity box below and attach a conformed copy of the organization's organizing and operational documents as indicated for each entity.

Corporation—Articles of incorporation, bylaws. Trust—Trust indenture. Other—Constitution or articles, bylaws.

Part III.—Activities and Operational Information

1 What are or will be the organization's sources of financial support? List in order of magnitude. If a portion of the receipts is or will be derived from the earnings of patents, copyrights, or other assets (excluding stock, bonds, etc.), identify such item as a separate source of receipt. Attach representative copies of solicitations for financial support.

Funds will come primarily from small contributions of a broad public, and secondarily from activities conducted. This broad public is the thousands of persons who participate in activities sponsored by the Roman Catholic organization Opus Dei. They will know of Woodlawn Foundation by word of mouth by the volunteer personnel who run the centers of Opus Dei throughout the country. This corporation fills a need for persons who want to make contributions which are available to all centers connected with Opus Dei rather than to a corporation which sponsors only one or a few centers.

2 Describe the organization's fund-raising program, both actual and planned, and explain to what extent it has been put into effect. (Include details of fund-raising activities such as selective mailings, formation of fund-raising committees, use of professional fund raisers, etc.)

There are no solicitation materials. The Foundation plans to raise funds through personal solicitation by word of mouth. No professional fund-raisers will be employed, only volunteers.

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NOV 26 1979

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

Thomas M. Quinn (Signature) A. W. Quinn, Jr. (Title or authority of signer) Nov 21 1979 (Date)

Part III.—Activities and Operational Information (Continued)

3 Give a narrative description of the activities presently carried on by the organization, and those that will be carried on. If the organization is not fully operational, explain what stage of development its activities have reached, what further steps remain for the organization to become fully operational, and when such further steps will take place. The narrative should specifically identify the services performed or to be performed by the organization. (Do not state the purposes of the organization in general terms or repeat the language of the organizational documents.) If the organization is a school, hospital, or medical research organization, include sufficient information in your description to clearly show that the organization meets the definition of that particular activity that is contained in the instructions for Part VII-A.

As soon as tax exempt status is established, an office will be set up and individuals will be requested to send monthly, quarterly or yearly contributions. Such contributions will then be distributed to organizations having an exempt status under Section 501(c)(3) of the Internal Revenue Code, and which are not private foundations. The office will be run by volunteers and it is envisioned that it will distribute at least 95% of the contributions received. In accordance with Article SECOND of its Chapter the organizations which receive distributions will be organizations which conduct activities and apostolates of the Roman Catholic organization Opus Dei.

In addition this organization will sponsor religious and doctrinal conferences and retreats.

4 The membership of the organization's governing body is:

(a) Names, addresses, and duties of officers, directors, trustees, etc.	(b) Specialized knowledge, training, expertise, or particular qualifications
Carl B. Schmitt, Jr., 944 Park Avenue, New York, New York 10028, Trustee, Director	Ph. D. History, Harvard University
Paul J. Deck, 944 Park Avenue, New York, New York 10028, Trustee, Director	B. Sc. in Acctg., St. Louis University
John B. Haley, 944 Park Avenue, New York, New York 10028, Trustee, Director	J. D. in Law, Notre Dame University

Part III.—Activities and Operational Information (Continued)

4 (c) Do any of the above persons serve as members of the governing body by reason of being public officials or being appointed by public officials? Yes No
If "Yes," please name such persons and explain the basis of their selection or appointment.

(d) Are any members of the organization's governing body "disqualified persons" with respect to the organization (other than by reason of being a member of the governing body) or do any of the members have either a business or family relationship with "disqualified persons"? (See specific instructions 4(d).) Yes No
If "Yes," please explain.

(e) Have any members of the organization's governing body assigned income or assets to the organization? Yes No
If "Yes," attach a copy of assignment(s) and a list of items assigned.

(f) Is it anticipated that any current or future member of the organization's governing body will assign income or assets to the organization? Yes No
If "Yes," explain fully on an attached sheet.

5 Does the organization control or is it controlled by any other organization? Yes No
Is the organization the outgrowth of another organization, or does it have a special relationship to another organization by reason of interlocking directorates or other factors? Yes No
If either of these questions is answered "Yes," please explain.

By its Charter it will aid and cooperate with the Catholic organization Opus Dei. However, no legal relationship of control or subsidiary corporation exists as defined by Section 509(a)(3).

6 Is the organization financially accountable to any other organization? Yes No
If "Yes," please explain and identify the other organization. Include details concerning accountability or attach copies of reports if any have been rendered.

7 (a) What assets does the organization have that are used in the performance of its exempt function? (Do not include property producing investment income.) If any assets are not fully operational, explain what stage of completion has been reached, what additional steps remain to be completed, and when such final steps will be taken.

None: It is planned to distribute all income received.

(b) To what extent have you used, or do you plan to use contributions as an endowment fund, i.e., hold contributions to produce income for the support of your exempt activities? No plans.

8 (a) What benefits, services, or products will the organization provide with respect to its exempt function?

It will sponsor religious retreats for cooperators (regular contributors) and interested individuals. It will distribute funds to exempt organizations.

Part III.—Activities and Operational Information (Continued)

8 (b) Have the recipients been required or will they be required to pay for the organization's benefits, services, or products? Yes No

If "Yes," please explain and show how the charges are determined.

Yes. The religious retreats will be held in rented facilities and the cost will be apportioned among those attending.

9 Does or will the organization limit its benefits, services or products to specific classes of individuals? . . . Yes No

If "Yes," please explain how the recipients or beneficiaries are or will be selected.

10 Is the organization a membership organization? Yes No

If "Yes," complete the following:

(a) Please describe the organization's membership requirements and attach a schedule of membership fees and dues. The only membership requirement is to aid in the activities of the corporation. There are no dues.

(b) Describe your present and proposed efforts to attract members, and attach a copy of any descriptive literature or promotional material used for this purpose.

All by word of mouth

(c) Are benefits, services, or products limited to members? Yes No

If "No," please explain.

Benefits and services will accrue to thousands of persons, including those who attend retreats and all those attending centers to which

this corporation makes distributions.

11 Does or will the organization engage in activities tending to influence legislation or intervene in any way in political campaigns? Yes No

If "Yes," please explain. (Note: You may wish to file Form 5768, Election/Revocation of Election by an Eligible Section 501(c)(3) Organization to Make Expenditures to Influence Legislation.)

12 Does the organization have a pension plan for employees? Yes No

13 Are you filing Form 1023 within 15 months from the end of the first month in which you were created or formed as required by section 508(a) and the Regulations thereunder? Yes No

If "No," and you are claiming that section 508(a) does not apply to you, attach an explanation of your basis for this claim.

Part IV.—Statement as to Private Foundation Status

1 Is the organization a private foundation? Yes No

2 If question 1 is answered "No," indicate the type of ruling being requested as to the organization's status under section 509 by checking the applicable box(es) below:

Definite ruling under section 509(a)(1), (2), (3), or (4) check here and complete Part VII.

Advance ruling under section 170(b)(1)(A)(vi) or 509(a)(2)—See instructions.

Extended advance ruling under section 170(b)(1)(A)(vi) or 509(a)(2)—See instructions.

3 If question 1 is answered "Yes," and the organization claims to be a private operating foundation, check here and complete Part VIII.

(Note: If an extended advance ruling is desired you must check the appropriate block for an advance ruling also.)

Statement of Receipts and Expenditures, for period ending To Date, 19

Receipts	1	Gross contributions, gifts, grants and similar amounts received	
	2	Gross dues and assessments of members	
	3	Gross amounts derived from activities related to organization's exempt purpose	
		Less cost of sales	
	4	Gross amounts from unrelated business activities	
		Less cost of sales	
	5	Gross amount received from sale of assets, excluding inventory items (attach schedule)	
	Less cost or other basis and sales expenses of assets sold		
6	Interest, dividends, rents and royalties		
7	Total receipts		
Expenditures	8	Fund raising expenses	
	9	Contributions, gifts, grants, and similar amounts paid (attach schedule)	
	10	Disbursements to or for benefit of members (attach schedule)	FUNDS
	11	Compensation of officers, directors, and trustees (attach schedule)	
	12	Other salaries and wages	
	13	Interest	
	14	Rent	YET
	15	Depreciation and depletion	
	16	Other (attach schedule)	SEE
	17	Total expenditures	BUDGET
	18	Excess of receipts over expenditures (line 7 less line 17)	

Balance Sheets		Enter dates ▶	Beginning date	Ending date
Assets				
19	Cash (a) Interest bearing accounts			
	(b) Other			NO
20	Accounts receivable, net			
21	Inventories			
22	Bonds and notes (attach schedule)			
23	Corporate stocks (attach schedule)			
24	Mortgage loans (attach schedule)			FUNDS
25	Other investments (attach schedule)			
26	Depreciable and depletable assets (attach schedule)			
27	Land			
28	Other assets (attach schedule)			
29	Total assets			YET
Liabilities				
30	Accounts payable			
31	Contributions, gifts, grants, etc., payable			SEE
32	Mortgages and notes payable (attach schedule)			BUDGET
33	Other liabilities (attach schedules)			
34	Total liabilities			
Fund Balance or Net Worth				
35	Total fund balance or net worth			
36	Total liabilities and fund balance or net worth (line 34 plus line 35)			

Has there been any substantial change in any aspect of your financial activities since the period ending date shown above? Yes No
 If "Yes," attach a detailed explanation.

Part VI.—Required Schedules for Special Activities	If "Yes," check here;	And, complete schedule—
1 Is the organization, or any part of it, a school?		A
2 Does the organization provide or administer any scholarship benefits, student aid, etc.?		B
3 Has the organization taken over, or will it take over, the facilities of a "for profit" institution?		C
4 Is the organization, or any part of it, a hospital or a medical research organization?		D
5 Is the organization, or any part of it, a home for the aged?		E
6 Is the organization, or any part of it, a litigating organization (public interest law firm or similar organization)?		F
7 Is the organization, or any part of it, formed to promote amateur sports competition?		G

Part VII.—Non-Private Foundation Status (Definitive ruling only)

A.—Basis for Non-Private Foundation Status

The organization is not a private foundation because it qualifies as:

	✓	Kind of organization	Within the meaning of	Complete
1	x	An integrated auxiliary of a Church--see letter a church	Sections 509(a)(1) and 170(b)(1)(A)(i)	
2		a school	Sections 509(a)(1) and 170(b)(1)(A)(ii)	
3		a hospital	Sections 509(a)(1) and 170(b)(1)(A)(iii)	
4		a medical research organization operated in conjunction with a hospital	Sections 509(a)(1) and 170(b)(1)(A)(iii)	
5		being organized and operated exclusively for testing for public safety	Section 509(a)(4)	
6		being operated for the benefit of a college or university which is owned or operated by a governmental unit	Sections 509(a)(1) and 170(b)(1)(A)(iv)	Part VII.-B
7	X	normally receiving a substantial part of its support from a governmental unit or from the general public	Sections 509(a)(1) and 170(b)(1)(A)(vi)	Part VII.-B
8		normally receiving not more than one-third of its support from gross investment income and more than one-third of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions (subject to certain exceptions)	Section 509(a)(2)	Part VII.-B
9		being operated solely for the benefit of or in connection with one or more of the organizations described in 1 through 4, or 6, 7, and 8 above	Section 509(a)(3)	Part VII.-C

B.—Analysis of Financial Support

	(a) Most recent taxable year	(Years next preceding most recent taxable year)			(e) Total
		(b) 19.....	(c) 19.....	(d) 19.....	
1	Gifts, grants, and contributions received				
2	Membership fees received				
3	Gross receipts from admissions, sales of merchandise or services, or furnishing of facilities in any activity which is not an unrelated business within the meaning of section 513		NO FUNDS YET		
			SEE BUDGET		
4	Gross income from interest, dividends, rents, royalties, and unrelated business taxable income (less section 511 tax) from businesses acquired by the organization after June 30, 1975				
5	Net income from organization's unrelated business activities not included on line 4				
6	Tax revenues levied for and either paid to or expended on behalf of the organization				
7	Value of services or facilities furnished by a governmental unit to the organization without charge (not including the value of services or facilities generally furnished the public without charge)				
8	Other income (not including gain or loss from sale of capital assets)—attach schedule				
9	Total of lines 1 through 8				
10	Line 9 less line 3				
11	Enter 2% of line 10, column (e) only				

12 If the organization has received any unusual grants during any of the above taxable years, attach a list for each year showing the name of the contributor, the date and amount of grant, and a brief description of the nature of such grant. Do not include such grants in line 1 above. (See instructions)

BUDGET OF WOODLAWN FOUNDATION

1st Fiscal Year (March, 1980--December, 1980)

RECEIPTS

Contributions and gifts*	\$50,500.
Dues from members	0.
Related activities	
-Retreat income	12,000.
-Religious formation center	8,000.
Unrelated business activities	0.
Sale of assets	0.
Interest, dividends, rents, royalties	<u>0.</u>
TOTAL RECEIPTS	\$70,500.

EXPENDITURES

Fund raising expenses (printing & stationary)	500.
Grants to:	
-Heights Foundation, Inc.	30,000.
-other 501(c)(3) organizations which are not private foundations	20,000.
Rent facilities for retreats and religious formation center	10,000.
Other program expenses	<u>10,000.</u>
TOTAL EXPENDITURES	\$70,500.

*Breakdown of contributions and gifts

Contributions in excess of \$1,000 by an individual:	\$10,000
Contributions from \$100 to \$1,000:	25,000
Contributions under \$100:	15,500

BUDGET OF WOODLAWN FOUNDATION

2nd Fiscal Year (January--December, 1981)

RECEIPTS

Contributions and gifts*	\$60,600.
Dues from members	0.
Related activities	
-Retreat income	14,400.
-Religious formation center	9,600.
Unrelated business activities	0.
Sale of assets	0.
Interest, dividends, rents, royalties	<u>0.</u>
TOTAL RECEIPTS	\$84,600.

EXPENDITURES

Fund raising expenses	600.
Grants to:	
-Heights Foundation, Inc.	36,000.
-Other 501(c)(3) organizations which are not private foundations	24,000.
Rent facilities for retreats and religious formation center	12,000.
Other program expenses	<u>12,000.</u>
TOTAL EXPENDITURES	\$84,600.

*Breakdown of contributions and gifts

Contributions in excess of \$1,000 by an individual:	\$12,000.
Contributions from \$100 to \$1,000:	30,000.
Contributions under \$100:	18,600.

MURRAY, QUINN & WILLEMS

ATTORNEYS AT LAW
36 WEST 44TH STREET
NEW YORK, N. Y. 10036

ROBERT W. MURRAY
THOMAS M. QUINN
HECTOR WILLEMS

DONALD M. HARRIS
(OF COUNSEL)

(212) 840-7570
(212) 840-7572
CABLE:
"LICENCIADO"

November 21, 1979

District Director
Internal Revenue Service
EP/EO Division
P. O. Box 3200
Church Street Station
New York, NY 10008

Re: The Woodlawn Foundation

Dear Sir or Madam:

Enclosed is an application on Form 1023 for recognition of tax exempt status of The Woodlawn Foundation as an organization described in Section 501(c)(3) of the Internal Revenue Code, of exclusively religious purposes.

In addition it is requested that the organization be exempted from filing annual returns pursuant to IRS Code Sec. 6033(a)(2)(A)(i) and the regulations thereunder as an integrated auxiliary of Opus Dei, a Roman Catholic organization and of the Catholic Church.

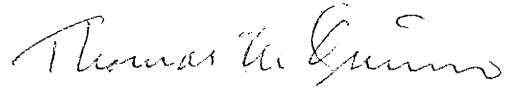
The basis of this request is that the projected activities of The Woodlawn Foundation, as described in the attached application, are exclusively religious, and it shares common religious bonds and convictions with Opus Dei and with the Roman Catholic Church such as to associate it therewith.

The following exhibits are attached to the application:

- Exhibit I. Power of Attorney for the undersigned
- Exhibit II. Conformed copy of Certificate of Incorporation
- Exhibit III. Conformed copy of By-Laws
- Exhibit IV. Application for I. D. number

Please advise if any further information is required.
I would be happy to attend a conference with your office if
that would be helpful.

Sincerely yours,

A handwritten signature in cursive script that reads "Thomas M. Quinn".

Thomas M. Quinn

TMQ:mea

Enclosures

cc.: Mr. Paul J. Deck

Power of Attorney
(See Separate Instructions)

Name, address including ZIP code, and identifying number of taxpayer(s)

THE WOODLAWN FOUNDATION
944 Park Avenue
New York, New York 10028

hereby appoints (name, address including ZIP code, and telephone number of appointee(s))

THOMAS M. QUINN, Esq.
36 West 44th Street
New York, New York 10036

212-840-7570

as attorney(s)-in-fact to represent the taxpayer(s) before any office of the Internal Revenue Service with respect to (specify Internal Revenue tax matters and years or periods):

Application for federal tax exemption

Said attorney(s)-in-fact (or either of them) shall, subject to revocation, have authority to receive confidential information and full power to perform on behalf of the taxpayer(s) the following acts with respect to the above tax matters:

(Strike through any of the following which are not granted.)

- To receive, but not to endorse and collect, checks in payment of any refund of Internal Revenue taxes, penalties, or interest.
- To execute waivers (including offers of waivers) of restrictions on assessment or collection of deficiencies in tax and waivers of notice of disallowance of a claim for credit or refund.
- To execute consents extending the statutory period for assessment or collection of taxes.
- To execute closing agreements under section 7121 of the Internal Revenue Code.
- To delegate authority or to substitute another representative.
- Other acts (specify)

Copies of notices and other written communications addressed to the taxpayer(s) in proceedings involving the above matters should be sent to (Name, address including ZIP code, and telephone number):

and THE WOODLAWN FOUNDATION
c/o Thomas M. Quinn, Esq.; 36 West 44th St.; NY 10036

This power of attorney revokes all prior powers of attorney and tax information authorizations on file with the same Internal Revenue office with respect to the same matters and years or periods covered by this instrument, except the following:

.....
(Specify to whom granted, date, and address including ZIP code, or refer to attached copies of prior powers and authorizations)

Signature of or for taxpayer(s)

If signed by a corporate officer, partner, or fiduciary on behalf of the taxpayer, I certify that I have the authority to execute this power of attorney on behalf of the taxpayer.

David J. Beck *Secretary* *November 20, 1979*
(Signature) (Title, if applicable) (Date)

.....
(Signature)

.....
(Title, if applicable)

.....
(Date)

If the power of attorney is granted to an attorney, certified public accountant, or enrolled agent, this declaration must be completed.

I declare that I am not currently under suspension or disbarment from practice before the Internal Revenue Service, and that:

- I am a member in good standing of the bar of the highest court of the jurisdiction indicated below; or
- I am duly qualified to practice as a certified public accountant in the jurisdiction indicated below; or
- I am enrolled as an agent pursuant to the requirements of Treasury Department Circular No. 230.

Designation (Attorney, C.P.A., or Agent)	Jurisdiction (State, etc.) or Enrollment Card Number	Signature	Date
Attorney	NY 1st Dept.	<i>Thomas W. Quinn</i>	Nov 28, 1979

If the power of attorney is granted to a person other than an attorney, certified public accountant, or enrolled agent, it must be witnessed or notarized below.

The person(s) signing as or for the taxpayer(s): (Check and complete one.)

is/are known to and signed in the presence of the two disinterested witnesses whose signatures appear here:

..... (Signature of Witness) (Date)

..... (Signature of Witness) (Date)

appeared this day before a notary public and acknowledged this power of attorney as his/her/their voluntary act and deed.

..... (Signature of Notary) (Date)

NOTARIAL SEAL
(If required)