SCIENTOLOGY MISSIONS INTERNATIONAL FORM 1023 APPLICATION

#### Internal Revenue Service

#### Department of the Treasury

Washington, DC 20224

Person to Contact:

J. Rotz

Scientology Missions International 6331 Hollywood Blvd. Suite 802 Los Angeles, CA 90028-6314

Telephone Number:

(202) 622-8100

Refer Reply to:

E:E0:R:2

Date:

OCT | 1993

Employer Identification Number: 95-3739098

Key District: Los Angeles
Service Center: Fresno, CA 93888

Accounting Period Ending: December 31

Toundation Status Classification: 509(a)(1) &

170(b)(1)(A)(i)

Form 990 Required: No

#### 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 section 501(c)(3). Your request for a group ruling is the subject of separate correspondence.

We have further determined that you are not a private foundation within the meaning of section 509(a) of the Code, because you are an organization described in the section(s) above.

If your sources of support, or your purposes, character, or method of operation change, please let your key distric. know so that office can consider the effect of the change on your exempt status and foundation status. In the case of an amended document or bylaws, please send a copy of the amended document or bylaws to your key district. Also, you should inform your key District Director of all changes in your name or address.

As of January 1, 1984, you are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$100 or more you pay to each of your employees during a calendar year. This does not apply, however, if you make or have made a timely election under section 3121(w) of the Code to be exempt from such tax. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Since you are not a private foundation, you are not subject to the excise taxes under Chapter 42 of the Code. However, you are not automatically exempt from other federal excise taxes. If you have any questions about excise, employment, or other federal taxes, please contact your key District Director.

Donors may deduct contributions to you as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522.

Donors (including private foundations) may rely on this ruling unless the Internal Revenue Service publishes notice to the contrary. However, if you lose your 509(a) status as shown above, donors (other than private foundations) may not rely on the classification shown above if they were in part responsible for, or were aware of, the act that resulted in your loss of such status, or they acquired knowledge that the Internal Revenue Service had given notice that you would be removed from that classification. Private foundations may rely on the classification as long as you were not directly or indirectly controlled by them or by disqualified persons with respect to them. However, private foundations may not rely on the classification shown above if they acquired knowledge that the Internal Revenue Service had given notice that you would be removed from that classification.

If your organization conducts fund raising events such as, benefit dinners, auctions, membership drives, etc., where something of value is received in return for contributions, you can help your donors avoid difficulties with their income tax returns by assisting them in determining the proper tax treatment of their contributions. To do this you should, in advance of the event, determine the fair market value of the benefit received and state it in your fund raising materials such as solicitations, tickets, and receipts in such a way that your donors can determine how much is deductible and how much is not. To assist you in this, the Service has issued Publication 1391, Deductibility of Payments Made to Organizations Conducting Fund Raising Events. You may obtain copies of Publication 1391 from your key district office.

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 are required to make a copy of your exemption application, and supporting documents, and this exemption letter available for public inspection. Failure to make these documents available for public inspection may subject you to a penalty of \$10 per day for each day there is failure to comply. See Internal Revenue Service Notice 88-120, 1988-2 C.B. 454, for additional information.

This ruling is based on evidence that your funds are dedicated to the purposes listed in section 501(c)(3) of the Code. To assure your continued exemption, you should maintain records to show that funds are expended only for those purposes. If you distribute funds to other organizations, your records should show whether they are exempt under section 501(c)(3). In cases where the recipient organization is not exempt under section 501(c)(3), there should be evidence that the funds will remain dedicated to the required purposes and that they will be used for those purposes by the recipient.

If distributions are made to individuals, case histories regarding the recipients should be kept showing names, addresses, purposes of awards, manner of selection, and relationship (if any) to members, officers, trustees or donors of funds to you, so that any and all distributions made to individuals can be substantiated upon request by the Internal Revenue Service. (Rev. Rul. 56-304 1956-2, C.B. 306.)

In this letter, we have not determined the effect on your tax-exempt status of financing your activities with the proceeds of tax-exempt bonds since you have not indicated that you intend to use such methods now or in the future.

You need an employer identification number even if you have no employees. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service. We are informing your key District Director of this ruling. Because this letter could help resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

If you have any questions about this ruling, please contact the person whose name and telephone number are shown in the

heading of this letter. For other matters, including questions concerning reporting requirements, please contact your key District Director.

Sincerely,

Jeanne S. Gessay Chief, Exempt Organizations

Rulings Branch 2

Jeone Georg

## Form 1023 Rev. September 1990)

Internal Revenue Service

# Application for Recognition of Exemption Under Section 501(c)(3) of the Internal Revenue Code

CM8 No 1545-0056

f exempt status is approved, this approved 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.

Part I Identification of Applicant	
1a Full name of organization (as shown in organizing document)	2 Employer identification number
Scientology Missions International	(If none, see instructions.) 95 3739098
1b c/o Name (if applicable)	Name and telephone number of person to be contacted if additional information is needed.
Address (number, street, and room or suite no.)	
6331 Hollywood Blvd. Suite 802	Thomas C. Spring ( 202) 588-8488
d City or town, state, and ZIP code	4 Month the annual accounting period ends
Los Angeles, California 90028-6314	December 31
Date incorporated or formed ceember 22, 1981 001	7 Check here if applying under section: a 501(e) b 501(f) c 501(k)
Did the organization previously apply for recognition of exemption under the section of the Code?  If "Yes," attach an explanation.  See Page 1A.	his Code section or under any other
	nere filed.
THE APPLICATION BEFORE MAILING.	ETE COPY OF THE CORRESPONDING/DOCUMENTS T
THE APPLICATION BEFORE MAILING.  Corporation— Attach a copy of your Articles of Incorporation, (including	ETE COPY OF THE CORRESPONDING DOCUMENTS T
THE APPLICATION BEFORE MAILING.	ETE COPY OF THE CORRESPONDING DOCUMENTS To amendments and restatements) showing approval by bylaws. Exhibits A & B.
THE APPLICATION BEFORE MAILING.  a  Corporation— Attach a copy of your Articles of Incorporation, (including the appropriate State official; also include a copy of your	ETE COPY OF THE CORRESPONDING DOCUMENTS To amendments and restatements) showing approval by bylaws.  Exhibits A & B.
THE APPLICATION BEFORE MAILING.  a  Corporation— Attach a copy of your Articles of Incorporation, (including the appropriate State official; also include a copy of your b  Trust— Attach a copy of your Trust Indenture or Agreement, including Association— Attach a copy of your Articles of Association, Constitution instructions) or other evidence the organization was form person; also include a copy of your bylaws.	ETE COPY OF THE CORRESPONDING DOCUMENTS To amendments and restatements) showing approval by bylaws.  Exhibits A & B. uding all appropriate signatures and dates.  In, or other creating document, with a declaration (see lied by adoption of the document by more than one
THE APPLICATION BEFORE MAILING.  a  Corporation— Attach a copy of your Articles of Incorporation, (including the appropriate State official; also include a copy of your border. Trust— Attach a copy of your Trust Indenture or Agreement, included.  Association— Attach a copy of your Articles of Association, Constitution instructions) or other evidence the organization was form person; also include a copy of your bylaws.  If you are a corporation or an unincorporated association that has not yet add.	ETE COPY OF THE CORRESPONDING DOCUMENTS To amendments and restatements) showing approval by bylaws.  Exhibits A & B. uding all appropriate signatures and dates.  In, or other creating document, with a declaration (see led by adoption of the document by more than one copted bylaws, check here
THE APPLICATION BEFORE MAILING.  a  Corporation— Attach a copy of your Articles of Incorporation, (including the appropriate State official; also include a copy of your b  Trust— Attach a copy of your Trust Indenture or Agreement, including Association— Attach a copy of your Articles of Association, Constitution instructions) or other evidence the organization was form person; also include a copy of your bylaws.	ETE COPY OF THE CORRESPONDING DOCUMENTS To amendments and restatements) showing approval by bylaws.  Exhibits A & B. uding all appropriate signatures and dates.  In, or other creating document, with a declaration (see led by adoption of the document by more than one copted bylaws, check here

For Paperwork Reduction Act Notice, see page 1 of the instructions.

Complete the Procedural Checklist (page 7 of the instructions) prior to filing.

Page 1A

#### Part I, Question 8 -- Previous Applications for Exemption

Scientology Missions International applied for recognition of its tax exempt status under section 501(c)(3) on March 31, 1983 but withdrew the application on April 27, 1985, before the IRS made any determination with respect to the application.

#### Part II Activities and Operational Information

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.

See pages 2A-2D.

2 What are or will be the organization's sources of financial support? List in order of size.

Tithes from missions.

Sales of religious books and ecclesiastical publications and materials. Investment income.

3 Describe the organization's fundraising program, both actual and planned, and explain to what extent it has been put into effect. Include details of fundraising activities such as selective mailings, formation of fundraising committees, use of volunteers or professional fundraisers, etc. Attach representative copies of solicitations for financial support.

SMI occasionally solicits donations from Scientologists to use to pay for books and religious materials needed by new missions if the new mission in question lacks sufficient funds to acquire the books and materials on its own. SMI solicits such donations on an informal basis and does not use written solicitations.

Page 2A

#### Part II, Question 1 -- Statement of Activities

Scientology Missions International ("SMI") was incorporated under the nonprofit corporation laws of California on December 22, 1981 to serve as the Mother Church for Scientology missions throughout the world. SMI is an integral part of the international ecclesiastical hierarchy of the Scientology religion.

SMI's specific activities are discussed below. information concerning the organizational structure, religious activities and financial affairs of the Scientology ecclesiastical hierarchy and related organizations is contained administrative record of the exemption determination proceeding for Church of Scientology International ("CSI"), the Mother Church of the Scientology religion.

Missions are the smallest organizations in the Scientology ecclesiastical hierarchy that minister religious services to They reach out and minister introductory or parishioners. beginning Scientology religious services to members of the general public who have not previously come in contact with Scientology. Missions often -- but not always -- are formed in parts of the world which have not previously been introduced to Scientology. Missions do not have full church status and do not minister any of the higher levels of Scientology religious services or train or ordain Scientology ministers. In effect, missions have the primary purpose of proselytizing Scientology to the general public and introducing new adherents to the basic doctrines and tenets of the faith.

SMI's purpose is to propagate and disseminate the Scientology religion by forming new missions and assisting existing missions to grow. SMI accomplishes its religious purposes through the following activities:

A. SMI sends missionairies to parts of the world and areas in the United States that do not have established churches of Scientology to help Scientology ministers in those areas open new missions. SMI maintains a "SMI Expansion Office" at Church of Scientology Flag Service Organization in Clearwater, Florida, where Scientologists come from all parts of the world to participate in the highest levels of Scientology religious services. This office encourages Church members to become missionairies by opening new missions, particularly in countries that do not yet have any churches or missions of Scientology.

Page 2B

#### Part II, Question 1 -- Statement of Activities

Individual Scientologists who want to contribute to the expansion of the Scientology faith by forming a mission are known as "mission holders." When the mission holder applies to SMI to start a mission he or she agrees to form a nonprofit organization within 60 days based on model organizational documents supplied by If SMI accepts the application, it issues to the mission holder a temporary license permitting the new organization to use the Scientology marks as a "forming mission." Copies of the application, model articles of incorporation and bylaws and the temporary license are attached as Exhibits C, D, E and F, respectively. If the forming mission is still operating at the end of the 60-day period and has complied with SMI's standards, the mission holder is allowed to obtain a permanent license to use the Scientology marks. A copy of this permanent license is attached as Exhibit G.

- SMI assists mission holders in forming new missions by providing them with Scientology Scriptural materials and other information they will need to undertake their program of religious activities, assisting them to incorporate and become legally established, and providing any other advice or assistance they may need.
- C. SMI exercises ecclesiastical authority with respect to the orthodoxy of Scientology religious practice by missions. Under written authority granted to it by Church of Scientology International ("CSI"), SMI permits Scientology missions to use the Scientology religious marks only under its supervision. Pursuant to this written authority, SMI carries out an oversight function with respect to missions to ensure that they comport with all legal and financial requirements for the area where they are located. SMI receives financial and other reports concerning their activities. A copy of the agreement permitting SMI to use the marks and in turn to permit their use by individual missions is attached as Exhibit H. Further information relating to SMI's relationship with CSI is included in the response to Part II, Question 5.
- SMI keeps missions informed of the activities of the Church of Scientology generally by providing them with its magazine, Centre, and other literature and with special briefings on recent significant developments. (A representative copy of Centre magazine is attached as Exhibit I.) In this way SMI coordinates the activities of missions with the goals and activities of the hierarchical church.

Page 2C

#### Part II, Question 1 -- Statement of Activities

- E. SMI also assists Scientology missions in times of crisis by sending experienced personnel to provide them with needed assistance. This assistance may relate to some religious matter, such as the orthodox ministry of Scientology religious services, or some local legal matter, such as acquisition of a suitable church facility or compliance with local zoning laws.
- F. SMI also enters into agreements with missions with respect to the orthodox use of films relating to the practice of the Scientology faith (Exhibit J) pursuant to an agreement concerning the films that SMI has with CSI (Exhibit K). The missions pay SMI two percent of the donations they receive for religious services plus a one time fee per film.
- G. SMI also enters into agreements with missions concerning the care of confidential information parishioners disclose in the ministration of religious services. A representative covenant is enclosed as Exhibit L.

Missions of Scientology support SMI's religious program of activities by contributing a tithe equal to ten percent of the contributions they receive in the ministry of Scientology religious services to their congregation. SMI uses this funding to support its day-to-day activities, to compensate CSI for its ecclesiastical guidance, and to reimburse CSI for parts of its broad-scale dissemination activities and legal costs in defending the religion. SMI uses this funding to support its day to day activities and to provide for religious programs and defense.

SMI is a "Sea Org" organization which means its staff members belong to the Scientology religious order, the Sea Organization (or the "Sea Org"). To become members of the Sea Org, SMI's staff members must pledge the next billion years of their existence to the Scientology religion. As Sea Org members, SMI staff live communally in church-provided berthing and eat communally in a church-provided dining room. They are required to live on church premises if at all reasonable, so they can live free of the distractions of the secular world and be ready to attend to their religious duties at any time during the day or night. As a general matter, each SMI staff member devotes 14 hours a day to his or her ecclesiastical duties and auditing or religious study.

Page 2D

#### Part II, Question 1 -- Statement of Activities

At present, SMI has 23 full-time staff personnel. They are compensated for their ecclesiastical service with a nominal allowance (currently \$50.00 a week) and bonuses for good performance of their assigned duties, room and board, medical and dental cost (as needed) and child care or school tuition for children. They also may receive commissions from sales of Scientology religious books equal to 15 percent of the book price. SMI staff are required to wear the official uniforms of the Sea Org, which SMI provides.

<u> </u>	Activities and Operational Information (Continued)		
1_	Give the following information about the organization's governing body:  Names, addresses, and titles of officers, directors, trustees, etc.	b Annual Com	pensation
	See page 3A attached.	See pages	3A - 3E
- c	Do any of the above persons serve as members of the governing body by reason of being public officials or be	หก <b>ส</b>	
	appointed by public officials?  If "Yes," name those persons and explain the basis of their selection or appointment.	. <b>□Y</b> ₩	<b>∑</b> No
đ	Are any members of the organization's governing body "disqualified persons" with respect to the organizatio (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 the specific instructions for line 4d.) if "Yes," explain.	n	Ž No
5	Does the organization control or is it controlled by any other organization?  Is the organization the outgrowth of (or successor to) another organization, or does it have a special relations with another organization by reason of interlocking directorates or other factors?  If either of these questions is answered "Yes," explain.	☑ Yes	□ No
	See pages 3B - 3C.		
6	Does or will the organization directly or indirectly engage in any of the following transactions with any politic organization or other exempt organization (other than 501(c)(3) organizations): (a) grants: (b) purchases or sales of assets: (c) rental of facilities or equipment; (d) loans or loan guarantees; (e) reimbursement arrangements: (f) performance of services, membership, or fundraising solicitations; or (g) sharing of facilit equipment, mailing lists or other assets, or paid employees?  If "Yes," explain fully and identify the other organizations involved.		ૐ No
7	is the organization financially accountable to any other organization?  If "Yes," explain and identify the other organization. Include details concerning accountability or attach copreports if any have been submitted.	· · · · · Yes	<u>∑</u> No
	But see Page 3B.		

Page 3A

Part II, Question 4 -- Officers, Directors and Trustees

#### TRUSTEES:

Jonathan Epstein 6331 Hollywood Boulevard, Suite 1200 Los Angeles, California 90028

Pablo Lobato 6331 Hollywood Boulevard, Suite 1200 Los Angeles, California 90028

Sherry Murphy 6331 Hollywood Boulevard, Suite 1200 Los Angeles, California 90028

#### DIRECTORS:

Jean Discher 6331 Hollywood Boulevard Los Angeles, California 90028

Claire Edwards 6331 Hollywood Boulevard Los Angeles, California 90028

Bernie Radburn 6331 Hollywood Boulevard Los Angeles, California 90028

#### OFFICERS:

Jean Discher - President 6331 Hollywood Boulevard Los Angeles, California 90028

Claire Edwards - Secretary-Treasurer 6331 Hollywood Boulevard Los Angeles, California 90028

The officers, directors and trustees of SMI are not compensated for the duties they perform in those capacities. directors and officers of SMI who are SMI staff members are compensated for the work they perform in their staff capacity as described in the response to Part II, Question 1. compensation paid to SMI's officers, directors and trustees for performing in their capacity as SMI staff is listed in the schedule

1 - 2

Page 3B

#### Part II, Question 4 -- Officers, Directors and Trustees

attached in response to Part IV, line 17, "Compensation of officers, directors and trustees."

#### Part II, Question 5 -- Relationship With Other Organizations

As discussed in the response to Part II, Question 1, SMI has a special relationship with Church of Scientology International ("CSI") through the licensing arrangements with respect to the Scientology religious marks. SMI also has a special relationship with Scientology missions, its subordinate organizations.

CSI is the Mother Church of the Scientology religion and exercises ecclesiastical authority over all churches of Scientology. CSI interacts with missions of Scientology through SMI in SMI's service as the Mother Church for missions. CSI provides SMI with ecclesiastical advice, programs and guidance, staff training, and general coordination with respect to the activities of other churches and organizations in the hierarchy. SMI provides information and reports concerning its activities and the missions of Scientology.

CSI has authorized SMI to use the Scientology religious marks and to exercise similar authority with respect to missions throughout the world. SMI assists existing and newly-formed missions to maintain orthodoxy by permitting them to use the religious marks associated with Scientology only under SMI's supervision. SMI provides guidance on matters of orthodoxy to its subordinate organizations, the missions, while CSI guides SMI.

CSI has authorized SMI to provide Scientology religious films to the missions. SMI collects the lease payments for these films and pays a fair royalty to the copyright owner, Author's Family Trust (Exhibit M), and pays CSI for the cost of the films.

SMI leases its office space from Building Management Services, a nonprofit corporation and integrated auxiliary of CSI formed for the purpose of holding title to properties used by churches and organizations of Scientology.

SMI's Expansion Office has an oral lease for the office it uses on the premises of Church of Scientology Flag Service Organization. (See responses to Part II, Question 1 and Part II, Question 9(b).)

Page 3C

#### Part II, Question 5 -- Relationship With Other Organisations

Some of SMI's trustees, directors and officers also hold corporate positions with other Scientology entities. Trustee Jonathan Epstein is the Treasurer of CSI and is a trustee of Church of Scientology Religious Trust and Dianetics Foundation International ("DFI"), and is a director and President and Treasurer of FSO Oklahoma Investments Inc. Trustee Pablo Lobato is also a trustee of Dianetics Centers International ("DCI"). Trustee Sherry Murphy is also a trustee of DCI, International Hubbard Ecclesiastical League of Pastors ("IHELP"), and World Association of Hubbard Enterprises, and is a director if DFI. Director Jean Discher is also a trustee of World Institute of Scientology Enterprises and IHELP. Director Bernie Radburn is also a director and the Secretary of DCI.

Par	Activities and Operational Information (Continued)	
8	What assets does the organization have that are used in the performance of its exempt function? (Do not include property prod investment income.) If any assets are not fully operational, explain their status, what additional steps remain to be completed, when such final steps will be taken. If "None," indicate "N/A."	ucing and
	fice furniture and equipment, leasehold improvements, an inventory	
bo	oks and materials and rights to use the Scientology religious marks	•
		∑ No
	If either of these questions is answered "Yes," attach a copy of the contracts and explain the relationship between the applicant and the other parties. SMI leases its office space from Building	□ No
a١	nagement Services. This is an oral lease for \$1031.84 per week. SMI so has an oral lease for space used by its expansion office with	
Ch	urch of Scientology Flag Service Organization Inc. for \$100.00 per	* <del>= = :</del>
	If "Yes," complete the following:	∑ No
	Describe the organization's membership requirements, and attach a schedule of membership fees and dues.	
	N/A	
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.	
	N/A	
c	What benefits do (or will) your members receive in exchange for their payment of dues?	
	N/A	<del>-</del>
113	If the organization provides benefits, services or products, are the recipients required, or will they be required, to pay for them?  If "Yes," explain how the charges are determined, and attach a copy of your current fee schedule.	□ No
	See Page 4A attached.	
b	Does or will the organization limit its benefits, services or products to specific individuals or classes of individuals?	□ No
	If "Yes," explain how the recipients or beneficiaries are or will be selected.	
	See Page 4A attached.	
12	Does or will the organization attempt to influence legislation?  If "Yes," explain. Also, give an estimate of the percentage of the organization's time and funds which it devotes or plans to devote to this activity.	₩No
13	Does or will the organization intervene in any way in political campaigns, including the publication or distribution of statements?  [] Yes  If "Yes," explain fully.	₹XNo

Page 4A

#### Part II, Question 11a -- Determination of Charges

The prices for the religious books and materials that SMI makes available to missions of Scientology and individuals forming new missions are established by the publisher, Bridge Publications, Inc. under the direction and with the approval of Church of Scientology International. The formula used to set prices utilizes three criteria: the prices must be affordable to a broad segment of the public; must be sufficient to enable the publisher to recover its costs of production and delivery; and must be sufficient to enable SMI to replenish stocks if necessary.

## Part II, Question 11b -- Limitations on Recipients of SMI's Services or Benefits

SMI limits its services and benefits to missions of Scientology and Scientologists in good standing with CSI who wish to serve as missionairies or open new missions.

E ACTE	1023	/ Day	9-901
0.00	1023		3-301

Part II	T	chnical Requirements (Continued)	
	Yes	ganization a private foundation?  (Answer question 8.)  (Answer question 9 and proceed as instructed.)	
<b>8</b> If )	you a	nswer "Yes" to question 7, do you claim to be a private operating foundation?	
	Yes	(Complete Schedule E) N/A	
Af		nswering this question, go to Part IV.	
ар	propr	iswer "No" to question 7, indicate the public charity classification you are reque ately applies:  GANIZATION IS NOT A PRIVATE FOUNDATION BECAUSE IT QUALIFIES:	sting by checking the box below that most
<b>/a</b> )		As a church or a convention or association of churches	Sections EQQ(a)(1)
(=)	, <del>-</del>	(CHURCHES MUST COMPLETE SCHEDULE A).	Sections 509(a)(1) and 170(b)(1)(A)(i)
			Sections 509(a)(1)
(b)		As a school (MUST COMPLETE SCHEDULE B).	and 170(b)(1)(A)(ii)
(c)	,	As a hospital or a cooperative hospital service organization, or a medical research organization operated in conjunction with a hospital	Sections 509(a)(1)
		(MUST COMPLETE SCHEDULE C).	and 170(b)(1)(A)(iii)
			Sections 509(a)(1)
<u>(d)</u>		As a governmental unit described in section 170(c)(1).	and 170(b)(1)(A)(v)
(●)	<u>ن</u> (	As being operated solely for the benefit of, or in connection with, one	
		or more of the organizations described in (a) through (d), (g), (h), or (i) (MUST COMPLETE SCHEDULE D).	Section 509(a)(3)
<u>(f)</u>		As being organized and operated exclusively for testing for public	
_		safety.	Section 509(a)(4)
<b>(E)</b>		As being operated for the benefit of a college or university that is	Sections 509(a)(1)
<u> </u>		owned or operated by a governmental unit.	and 170(b)(1)(A)(iv)
(h)	· 🗀	As receiving a substantial part of its support in the form of contributions from publicly supported organizations, from a	Sections 509(a)(1)
		governmental unit, or from the general public.	and 170(b)(1)(A)(vi)
(1)		As 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	Section ECO(a)(2)
_		related to its exempt functions (subject to certain exceptions).	Section 509(a)(2)
/15		We are a publish supported armanization but are not aura whether we	Sections 509(a)(1)
(I)	_	We are a publicly supported organization but are not sure whether we meet the public support test of block (h) or block (i). We would like the	and 170(b)(1)(A)(vi) or
		Internal Revenue Service to decide the proper classification.	Section 509(a)(2)

If you checked one of the boxes (a) through (f) in question 9, go to question 14. If you checked box (g) in question 9, go to questions 11 and 12. If you checked box (h), (i), or (j), go to question 10.

· or	7 (23 (Rev 3-90)			
P,	Technical Requirements (Continued)			
10	If you checked box (h), (i), or (j) in question 9, have you completed a tax year of at least 8 months?  Yes—Indicate whether you are requesting:  A definitive ruling (Answer questions 11 through 14.)  An advance ruling (Answer questions 11 and 14 and attach 2 Forms 872-C completed and signed.)  No—You must request an advance ruling by completing and signing 2 Forms 872-C and attaching the	Z/A	your	apolication
11	If the organization received any unusual grants during any of the tax years shown in Part IV-A, attach a list for name of the contributor; the date and the amount of the grant; and a brief description of the nature of the grant.	AACD	year	showing the
	N/A			
12	If you are requesting a definitive ruling under section 170(b)(1)(A)(iv) or (vi), check here ▶ ☐ and:		<del></del>	
	Enter 2% of line 8, column (e) of Part IV-A	/ A		
	Attach a list showing the name and amount contributed by each person (other than a governmental unit organization) whose total gifts, grants, contributions, etc., were more than the amount you entered on line 12a	r fpul Stahow	blicly	supported*
13	If you are requesting a definitive ruling under section 509(a)(2), check here ▶ ☐ and:  For each of the years included on lines 1, 2, and 9 of Part IV-A, attach a list showing the name of and amount disqualified person.*			from each
<b>b</b>	For each of the years included on line 9 of Part IV-A, attach a list showing the name of and amount received than a "disqualified person") whose payments to the organization were more than \$5,000. For this purpose, not limited to, any organization described in sections 170(b)(1)(A)(i) through (vi) and any governmental agency	Daver	" inci	udes, but is
14	Indicate if your organization is one of the following. If so, complete the required schedule. (Submit only those schedules that apply to your organization. Do not submit blank schedules.)	Yes	No	if "Yes," complete Schedule:
	Is the organization a church?	Х		A
	is the organization, or any part of it, a school?		X	8
	is the organization, or any part of it, a hospital or medical research organization?		Х	<sup>+</sup> C
	Is the organization a section 509(a)(3) supporting organization?		Х	D
	Is the organization an operating foundation?		X	Ε
	Is the organization, or any part of it, a home for the aged or handicapped?		Χ	F
	Is the organization, or any part of it, a child care organization? .		Х	G
	Does the organization provide or administer any scholarship benefits, student aid, etc.?		X	н

Has the organization taken over, or will it take over, the facilities of a "for profit" institution?

Χ

<sup>\*</sup> See detailed information in the administrative record of CSI's determination proceeding for information responsive to this Schedule A.

## Part IV Financial Data SCIENTOLOGY MISSIONS INTERNATIONAL

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	of Revenue and E	xpenses		
		Current tax year	3 prior tax year	rs or proposed budg	get for 2 years	
1	Gifts, grants, and contributions received (not including unusual	(a) From Jan to Decg1	(b) 19 <u>90</u>	(c) 19 89	(d) 1988	(e) TOTAL
	grants-see instructions)	1234563	1756530	2054740	5251154	10296987
2	Membership fees received					
3	Gross investment income (see					
	instructions for definition)	7908	23451	35670	336	67365
4	Net income from organization's					
	unrelated business activities not included on line 3					
5	Tax revenues levied for and					1
	either paid to or spent on behalf					
	of the organization					
6	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)					
7						
1	gain or loss from sale of capital					
İ	assets) (attach schedule)	2628	-10454	-16891		-24717
8	Total (add lines 1 through 7)	1245099	1769527	2073519	5251490	10339635
9	Gross receipts from admissions, sales of merchandise or services, or furnishing of facilities in any activity that is not an unrelated business within the meaning of section	951997	1954566	878807	200004	3985374
	513	2197096	3724093	2952326	5451494	14325009
10		2197096	3/24093	2952326	3431434	1432300
11	•	-1767	51328	-562	-1222	4777
1	assets (attach schedule)	-1/6/	31328	-362	-1222	3///
12	Unusual grants					
13	Total revenue (add lines 10	2105220	2775421	2051764	5450272	14372786
	through 12)	2195329 4945	3775421	2951764 3800	7876	
14	• , ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	4945	14901	3800	/8/0	
15		900000	2227022	1792747		
	amounts gaid (attach schedule)	890000	3327932	1/76/4/		
16	Disbursements to or for benefit					
	of members (attach schedule)					
1	Compensation of officers,					
1	directors, and trustees (attach	6729	5553	3813	7208	
18	schedule)	30157	29136	23678	32780	
18	- · · · · · · · · · · · · · · · · · · ·	5022	4971			
	Interest	162117	26108	23676	18155	
20	Occupancy (rent, utilities, etc.)	36870	30856	13873	40	
21	Depreciation and depletion	2636393	794259	763913	507685	
22	Other (attach schedule)	200000				
23	Total expenses (add lines 14	3772233	4233716	2625500	573744	
	through 22)	3,,2233	.233.20			
24	Excess of revenue over					
J	expenses (line 13 minus line	-1576904	-458295	326264	4876528	1

	B Balance Sheet (at the end of the period shown)		Current tax year Date 12/31/91
	Assets		31, 31
1	Cash	1	118070
2	Accounts receivable, net	2	
3	Inventories	ł	
4	Bonds and notes receivable (attach schedule)	ł	2801130
5	Corporate stocks (attach schedule)		
6	Mortgage loans (attach schedule)	6	
7	Other investments (attach schedule)	1	2169
8	Depreciable and depletable assets (attach schedule)	1	329367
9	Land		
10	Other assets (attach schedule)		
11	Total assets (add lines 1 through 10)		3250736
	Liabilities		
12	Accounts payable	12	29694
	Contributions, gifts, grants, etc., payable		
14	Mortgages and notes payable (attach schedule)	14	4 - 5
15	Other liabilities (attach schedule)	15	
16	Total liabilities (add lines 12 through 15)		29694
	Fund Balances or Net Assets		
17	Total fund balances or net assets	17	3221042
		•	3250736

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-91

#### Part IV Section A Line 7 Other Income

Type of Income Source	Amount
Unrealized Gain on Foreign Currencies held	2,628
	\$ 2,628
	========

Schedule 1

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-90

Part IV Section A Line 7 Other Income

Type of Income Source

Amount

Unrealized Loss on Foreign Currencies held

(10,454)

(\$ 10,454)

========

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-89

Part IV Section A Line 7 Other Income

Type of Income Source

Amount

Unrealized Loss on Foreign Currencies held

(16,891)

(\$ 16,891)

=========

# - x - Z -

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-91

## Part IV Section A Line 11 Gain or Loss from Sale of Capital Assets

Asset	To Whom Sold	Cost	Accumulated Depreciation	Sale Price	Gain(Loss)
400 Shares International Paper Company	Merrill Lynch	18,550		24,452	5,902
Realized Loss on Foreign Currency Conversion to US \$	Kredietbank Luxembourg				(7,669)
					(\$ 1,767)
					========

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-90

#### Part IV Section A Line 11 Gain or Loss from Sale of Capital Assets

Asset	To Whom Sold	Cost	Accumulated Depreciation	Sale Price	Gain(Los:
Realized Gain on Foreign Currency Conversion to US \$	Kredietbank Luxembourg				51,32
					\$ 51,32

#### Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-89

#### Part IV Section A Line 11 Gain or Loss from Sale of Capital Assets

Asset	To Whom Sold	Cost	Accumulated Depreciation	Sale Price	Gain(Loss)
Realized Loss on Foreign Currency Conversion to US \$	Kredietbank Luxembourg				(562)
					(\$ 562)

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-88

#### Part IV Section A Line 11 Gain or Loss from Sale of Capital Assets

Asset	To Whom Sold	Cost	Accumulated Depreciation	Sale Price	Gain(Loss)
Realized Loss on Foreign Currency Conversion to US \$	Kredietbank Luxembourg				(1,222)
					(\$ 1,222)

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-91

## Part IV Section A Line 15 Contributions, Gifts, Grants, and Similar Amounts Paid

			10041	========
			Total	\$ 890,000
*	Church of Scientology International	Religious Program		890,000
	Recipient	Purpose		Amount

\* Contributions to CSI's religious program, including payments for ecclesiastical guidance and staff training.

#### Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-90

#### Part IV Section A Line 15 Contributions, Gifts, Grants, and Similar Amounts Paid

	Recipient		Purpose		Amount
*	Church of Scientology In	nternational	Religious Program		3,327,932
				Total	\$ 3,327,932

\* Contributions to CSI's religious program, including payments for ecclesiastical guidance and staff training.

Schedule 9

1000

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-89

## Part IV Section A Line 15 Contributions, Gifts, Grants, and Similar Amounts Paid

	Recipient		Purpose		Amount
*	Church of Scientology	International	Religious Program		1,792,747
				Total	\$ 1,792,747
					=========

\* Contributions to CSI's religious program, including payments for ecclesiastical guidance and staff training.

#### Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-91

## Part IV Section A Line 17 Compensation of Officers, Directors, and Trustees

	<u>Name</u>	Position	Time Devoted	Compensation
	Pablo Lobato	Trustee	As necessary	0
	Jessica Pruett	Trustee	As necessary	0
	Jonathan Epstein	Trustee	As necessary	0
	Sherry Murphy	Trustee	As necessary	0
*	Jean Discher	Director, President	As necessary	2,481
*	Claire Edwards	Director, Secretary, Treasurer	As necessary	2,125
*	Bernard Radburn	Director, Assistant Secretary	As necessary	2,123
				\$ 6,729
				=======

\* The compensation to these individuals was only for their service as staff of the organization, not their service as Officers, Directors or Trustees.

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-90

#### Part IV Section A Line 17 Compensation of Officers, Directors, and Trustees

	Name	Position	Time Devoted	Compensation
	Pablo Lobato	Trustee	As necessary	0
	Jonathan Epstein	Trustee	As necessary	0
	Jessica Pruett	Trustee	As necessary	0
	Suzanne Bolstad	Trustee	As necessary	0
*	Jean Discher	Director, President	As necessary	2,628
*	Beate Gordon	Director, Secretary, Treasurer	As necessary	300
*	Claire Edwards	Director, Secretary, Treasurer	As necessary	150
*	Bernard Radburn	Director, Assistant Secretary	As necessary	2,475
				\$ 5,553

\* The compensation to these individuals was only for their service as staff of the organization, not their service as Officers, Directors or Trustees.

#### Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-89

#### Part IV Section A Line 17 Compensation of Officers, Directors, and Trustees

	Name	Position	Time Devoted	Compensation
	Jonathan Epstein	Trustee	As necessary	0
	Suzanne Bolstad	Trustee	As necessary	0
	Jessica Pruett	Trustee	As necessary	0
*	Greg Sollecito	Director, President	As necessary	695
*	Jean Discher	Director, President	As necessary	1,825
	Paolo Ruggeri	Director, Secretary	As necessary	0
	Beate Gordon	Director, Secretary, Treasurer	As necessary	0
*	Bernard Radburn	Director, Assistant Secretary	As necessary	1,293
				\$ 3,813
				=======

\* The compensation to these individuals was only for their service as staff of the organization, not their service as Officers, Directors or Trustees.

#### Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-88

## Part IV Section A Line 17 Compensation of Officers, Directors, and Trustees

	Name	Position	Time Devoted	Compensation
	Jonathan Epstein	Trustee	As necessary	0
	Cheryl Sutter	Trustee	As necessary	0
	Thomas Ashworth	Trustee	As necessary	0
	Jessica Pruett	Trustee	As necessary	0
	Suzanne Bolstad	Trustee	As necessary	0
	Janis Grady	Trustee	As necessary	0
	Beate Gordon	Director	As necessary	0
	Paolo Ruggeri	Director	As necessary	0
*	Greg Sollecito	Director	As necessary	366
*	Jean Discher	Director	As necessary	1,617
*	Bernard Radburn	Director, President	As necessary	
	Robyn Mathieson	Director, Secretary	As necessary	0
*	Jocinda Rhoads	Secretary	As necessary	671
*	Amir Gobriel	Treasurer	As necessary	2,242
				\$ 7,208

\* The compensation to these individuals was only for their service as staff of the organization, not their service as Officers, Directors or Trustees.



#### Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-91

#### Part IV Section A Line 22 Other Expenses

Other Expenses		Amount
Bank Charges		16,656
Dissemination		392,525
Equipment Rental & Maintenance		30,769
Insurance		5,009
Legal, Professional, Accountancy Fees & Legal	Settlement	1,343,395
Office & Administration	1	22,657
Postage & Shipping	*	108,344
Printing & Publications	,	295,319
Purchases for Resale	\$ 6	4,936
Religious Books & Materials Sales Commissions		372
Royalties	تعني بعدته	4,100
Staff Enhancement Expenses and Materials	<b>*</b>	11,180
Staff Room & Board and Other Benefits		156,459
State Franchise Tax	<b>.</b>	800
Telephone, Telex & Facsimile		57,203
Travel & Transport	•	186,669
		\$ 2,636,393
		<b>新华林林林林林林</b>

#### Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-90

#### Part IV Section A Line 22 Other Expenses

Other Expenses	Amount
Bank Charges	12,470
Dissemination	158,473
Equipment Rental & Maintenance	31,079
Insurance	6,457
Legal, Professional & Accountancy Fees	33,645
Office & Administration	16,591
Postage & Shipping	87,073
Printing & Publications	206,133
Purchases for Resale	7,000
Religious Books & Materials Sales Commissions	685
Royalties	4,884
Staff Enhancement Expenses and Materials	3,128
Staff Room & Board and Other Benefits	96,796
State Franchise Tax	1,750
Telephone, Telex & Facsimile	34,685
Travel & Transport	93,410
	\$ 794,259
	*****

Schedule 16

i . .

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-89

#### Part IV Section A Line 22 Other Expenses

Other Expenses	Amount
Bank Charges	10,935
Dissemination	141,594
Equipment Rental & Maintenance	32,795
Insurance	8,481
Legal, Professional & Accountancy Fees	376
Office & Administration	44,965
Postage & Shipping	60,075
Printing & Publications	121,667
Purchases for Resale	6,007
Religious Books & Materials Sales Commissions	195
Staff Enhancement Expenses and Materials	575
Staff Room & Board and Other Benefits	134,662
State Franchise Tax	600
Telephone, Telex & Facsimile	129,787
Travel & Transport	71,199
	\$ 763,913

Schedule 17

1 3 3

#### Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-88

#### Part IV Section A Line 22 Other Expenses

Other Expenses	Amount
Bank Charges	912
Dissemination	61,060
Equipment Rental & Maintenance	18,392
Legal & Professional Fees	5,660
Office & Administration	26,401
Postage & Shipping	41,577
Printing & Publications	44,880
Staff Enhancement Expenses and Materials	566
Staff Room & Board and Other Benefits	134,302
State Franchise Tax	600
Telephone, Telex & Facsimile	126,377
Travel & Transport	46,958
	\$ 507,685
	<b>三亚亚王王和</b> 世立宫主

Schedule 18

1 - -

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-91

## Part IV Section B Line 4 Bonds and Notes Receivable

Name of Borrower	Obligation	Rate of Return	Due Date	Amount
Church of Scientology Religious Trust	Loan for carrying out its Religious Program	Interest-free	None	2,797,531
Dianetik Stuttgart E.V.	Loan for Mission Operating Expenses	Interest-free	None	3,599
			Total	\$ 2,801,130

#### Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-91

#### Part IV Section B Line 7 Other Investments

Type of Investment	Description	Amount
Money Market Fund	277.777 shares in Prudential High Yield Fund	2,169
		\$ 2,169

Federal I.D. Number 95-3739098

Form 1023

Period Ended: 31-Dec-91

#### Part IV Section B Line 8 Depreciable and Depletable Assets

		Accumulated Depreciation/	
Description of Asset	Cost	Amortization	Book Value
Computers, Fixtures & Equipment	62,739	29,365	33,374
Leasehold Improvements	348,226	52,233	295,993
	\$ 410,965	\$ 81,598	\$ 329,367