

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

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.

Complete the Procedural Checklist on page 8 of the instructions.

Part I Identification of Applicant

1a Full name of organization (as shown in organizing document) <i>The Nikwasi Land Trust, Inc.</i>		2 Employer identification number (EIN) (If none, see page 3 of the Specific Instructions.) <i>S6: 2142199</i>
1b c/o Name (if applicable)		3 Name and telephone number of person to be contacted if additional information is needed <i>Paul J. Carlson</i> <i>(828) 524-2711</i>
1c Address (number and street) <i>3257 Goshen Road</i>	Room/Suite	4 Month the annual accounting period ends <i>December</i>
1d City, town, or post office, state, and ZIP + 4. If you have a foreign address, see Specific Instructions for Part I, page 3. <i>Franklin, North Carolina 28734</i>		5 Date incorporated or formed <i>April 28, 1999</i>
1e Web site address		6 Check here if applying under section: a <input type="checkbox"/> 501(e) b <input type="checkbox"/> 501(f) c <input type="checkbox"/> 501(k) d <input type="checkbox"/> 501(n)
7 Did the organization previously apply for recognition of exemption under this Code section or under any other section of the Code? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," attach an explanation.		
8 Is the organization required to file Form 990 (or Form 990-EZ)? <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "No," attach an explanation (see page 3 of the Specific Instructions).		
9 Has the organization filed Federal income tax returns or exempt organization information returns? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," state the form numbers, years filed, and Internal Revenue office where filed.		

10 Check the box for the type of organization. ATTACH A CONFORMED COPY OF THE CORRESPONDING ORGANIZING DOCUMENTS TO THE APPLICATION BEFORE MAILING. (See **Specific Instructions** for Part I, Line 10, on page 3.) See also Pub. 557 for examples of organizational documents.)

- a Corporation—Attach a copy of the Articles of Incorporation (including amendments and restatements) showing approval by the appropriate state official; also include a copy of the bylaws. *(see Attachment A)*
- b Trust— Attach a copy of the Trust Indenture or Agreement, including all appropriate signatures and dates.
- c Association—Attach a copy of the Articles of Association, Constitution, or other creating document, with a declaration (see instructions) or other evidence the organization was formed by adoption of the document by more than one person; also include a copy of the bylaws.

If the organization is a corporation or an unincorporated association that has not yet adopted bylaws, check here

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

Please Sign Here Paul J. Carlson - Executive Director June 22, 1999
 (Signature) (Type or print name and title or authority of signer) (Date)

Part II Activities and Operational Information

- 1 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 the organizational document.** List each activity separately in the order of importance based on the relative time and other resources devoted to the activity. Indicate the percentage of time for each activity. Each description should include, as a minimum, the following: (a) a detailed description of the activity including its purpose and how each activity furthers your exempt purpose; (b) when the activity was or will be initiated; and (c) where and by whom the activity will be conducted.

See Attachment B

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

- State of North Carolina Clean Water Management Trust Fund grant for the Little Tennessee River Project (funded through the Southern Appalachian Highlands Conservancy).
- Private Foundations (Lyndhurst Foundation of Chattanooga, TN, Macon Co. Comm. Foundation)
- Individual and Corporate donations.

- 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.

- Grant proposals to governmental entities (2 grants already received from State of NC)
- Grant proposals to private foundations (1 grant already received from Lyndhurst Found.)
- Board plans to form fundraising and development committee to solicit individual & corp. donations
- Eventual plan to market promotional and educational materials (t-shirts, maps, etc.) to publicize and support the organization and its mission (income from this source will not exceed 5% of annual operating budget).

Part II Activities and Operational Information (Continued)

4 Give the following information about the organization's governing body:

a Names, addresses, and titles of officers, directors, trustees, etc.

- Paul J. Carlson, Executive Director
3257 Goshen Road
Franklin, North Carolina 28734

- See Attachment C for names and addresses of the Board of Directors (all serve without compensation)

b Annual compensation

Executive Director's annual compensation:
\$ 32,000.⁰⁰

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," name those 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 for Part II, Line 4d, on page 3.) Yes No
If "Yes," explain.

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

The Nikwasi Land Trust originally organized in 1996 as an affiliate of the Southern Appalachian Highlands Conservancy, Inc., a 501(c)3 organization, and has operated until the present as a local program, in the Little Tennessee Valley, of this larger, regional land conservancy.

6 Does or will the organization directly or indirectly engage in any of the following transactions with any political organization or other exempt organization (other than a 501(c)3 organization): (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 facilities, equipment, mailing lists or other assets, or paid employees? Yes No
If "Yes," explain fully and identify the other organizations involved.

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

As an affiliate of the Southern Appalachian Highlands Conservancy (SAHC), a 501(c)3 organization, all grants and donation income as well as expenditures of the Nikwasi Land Trust program has been under the fiscal responsibility of SAHC and accounted for in their annual external audit. Monthly invoices of all Nikwasi Land Trust expenditures are submitted by the Nikwasi Land Trust Director to the SAHC office in Asheville, NC. See Attachment D for example of monthly accounting invoice submitted by the Nikwasi Land Trust Director to the SAHC office in Asheville, NC.

Part II 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 producing investment income.) If any assets are not fully operational, explain their status, what additional steps remain to be completed, and when such final steps will be taken. If none, indicate "N/A."

Donated computer and printer.

9 Will the organization be the beneficiary of tax-exempt bond financing within the next 2 years? Yes No

10a Will any of the organization's facilities or operations be managed by another organization or individual under a contractual agreement? Yes No

b Is the organization a party to any leases? Yes 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.

11 Is the organization a membership organization? Yes No
If "Yes," complete the following:

a Describe the organization's membership requirements and attach a schedule of membership fees and dues.

b Describe the organization's present and proposed efforts to attract members and attach a copy of any descriptive literature or promotional material used for this purpose.

c What benefits do (or will) the members receive in exchange for their payment of dues?

12a If the organization provides benefits, services, or products, are the recipients required, or will they be required, to pay for them? N/A Yes No
If "Yes," explain how the charges are determined and attach a copy of the current fee schedule.

b Does or will the organization limit its benefits, services, or products to specific individuals or classes of individuals? N/A Yes No
If "Yes," explain how the recipients or beneficiaries are or will be selected.

13 Does or will the organization attempt to influence legislation? Yes No
If "Yes," explain. Also, give an estimate of the percentage of the organization's time and funds that it devotes or plans to devote to this activity.

Although at present we have no plans to influence legislation, we will file form 5768 in case in the future we decide to allocate limited resources for this purpose (not to exceed 10% of the organization's operating budget).

14 Does or will the organization intervene in any way in political campaigns, including the publication or distribution of statements? Yes No
If "Yes," explain fully.

Part III Technical Requirements

1 Are you filing Form 1023 within 15 months from the end of the month in which your organization was created or formed? Yes No
If you answer "Yes," do not answer questions on lines 2 through 6 below.

2 If one of the exceptions to the 15-month filing requirement shown below applies, check the appropriate box and proceed to question 7.

Exceptions—You are not required to file an exemption application within 15 months if the organization:

- a Is a church, interchurch organization of local units of a church, a convention or association of churches, or an integrated auxiliary of a church. See **Specific Instructions**, Line 2a, on page 4;
- b Is not a private foundation and normally has gross receipts of not more than \$5,000 in each tax year; or
- c Is a subordinate organization covered by a group exemption letter, but only if the parent or supervisory organization timely submitted a notice covering the subordinate.

3 If the organization does not meet any of the exceptions on line 2 above, are you filing Form 1023 within 27 months from the end of the month in which the organization was created or formed? Yes No

If "Yes," your organization qualifies under Regulation section 301.9100-2, for an automatic 12-month extension of the 15-month filing requirement. Do not answer questions 4 through 6.

If "No," answer question 4.

4 If you answer "No" to question 3, does the organization wish to request an extension of time to apply under the "reasonable action and good faith" and the "no prejudice to the interest of the government" requirements of Regulations section 301.9100-3? Yes No

If "Yes," give the reasons for not filing this application within the 27-month period described in question 3. See **Specific Instructions**, Part III, Line 4, before completing this item. Do not answer questions 5 and 6.

If "No," answer questions 5 and 6.

5 If you answer "No" to question 4, your organization's qualification as a section 501(c)(3) organization can be recognized only from the date this application is filed. Therefore, do you want us to consider the application as a request for recognition of exemption as a section 501(c)(3) organization from the date the application is received and not retroactively to the date the organization was created or formed? Yes No

6 If you answer "Yes" to question 5 above and wish to request recognition of section 501(c)(4) status for the period beginning with the date the organization was formed and ending with the date the Form 1023 application was received (the effective date of the organization's section 501(c)(3) status), check here and attach a completed page 1 of Form 1024 to this application.

Part III Technical Requirements (Continued)

- 7 Is the organization a private foundation?
 Yes (Answer question 8.)
 No (Answer question 9 and proceed as instructed.)

- 8 If you answer "Yes" to question 7, does the organization claim to be a private operating foundation?
 Yes (Complete Schedule E.)
 No

After answering question 8 on this line, go to line 14 on page 7.

- 9 If you answer "No" to question 7, indicate the public charity classification the organization is requesting by checking the box below that most appropriately applies:

THE ORGANIZATION IS NOT A PRIVATE FOUNDATION BECAUSE IT QUALIFIES:

- | | | |
|---|--|--|
| a | <input type="checkbox"/> As a church or a convention or association of churches (CHURCHES MUST COMPLETE SCHEDULE A.) | Sections 509(a)(1) and 170(b)(1)(A)(i) |
| b | <input type="checkbox"/> As a school (MUST COMPLETE SCHEDULE B.) | Sections 509(a)(1) and 170(b)(1)(A)(ii) |
| c | <input type="checkbox"/> As a hospital or a cooperative hospital service organization, or a medical research organization operated in conjunction with a hospital (These organizations, except for hospital service organizations, MUST COMPLETE SCHEDULE C.) | Sections 509(a)(1) and 170(b)(1)(A)(iii) |
| d | <input type="checkbox"/> As a governmental unit described in section 170(c)(1). | Sections 509(a)(1) and 170(b)(1)(A)(v) |
| e | <input type="checkbox"/> 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) |
| f | <input type="checkbox"/> As being organized and operated exclusively for testing for public safety. | Section 509(a)(4) |
| g | <input type="checkbox"/> As being operated for the benefit of a college or university that is owned or operated by a governmental unit. | Sections 509(a)(1) and 170(b)(1)(A)(iv) |
| h | <input checked="" type="checkbox"/> As receiving a substantial part of its support in the form of contributions from publicly supported organizations, from a governmental unit, or from the general public. | Sections 509(a)(1) and 170(b)(1)(A)(vi) |
| i | <input type="checkbox"/> 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 related to its exempt functions (subject to certain exceptions). | Section 509(a)(2) |
| j | <input type="checkbox"/> The organization is a publicly supported organization but is not sure whether it meets the public support test of h or i. The organization would like the IRS to decide the proper classification. | Sections 509(a)(1) and 170(b)(1)(A)(vi) or 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, in question 9, go to question 10.

Part III Technical Requirements (Continued)

- 10 If you checked box h, i, or j in question 9, has the organization 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 two Forms 872-C completed and signed.)
 No—You must request an advance ruling by completing and signing two Forms 872-C and attaching them to the Form 1023.
- 11 If the organization received any unusual grants during any of the tax years shown in Part IV-A, **Statement of Revenue and Expenses**, attach a list for each year showing the name of the contributor; the date and the amount of the grant; and a brief description of the nature of the grant.

- 12 If you are requesting a definitive ruling under section 170(b)(1)(A)(iv) or (vi), check here and:
 a Enter 2% of line 8, column (e), Total, of Part IV-A
 b Attach a list showing the name and amount contributed by each person (other than a governmental unit or "publicly supported" organization) whose total gifts, grants, contributions, etc., were more than the amount entered on line 12a above.

- 13 If you are requesting a definitive ruling under section 509(a)(2), check here and:
 a 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 received from each "disqualified person." (For a definition of "disqualified person," see **Specific Instructions**, Part II, Line 4d, on page 3.)
 b For each of the years included on line 9 of Part IV-A, attach a list showing the name of and amount received from each payer (other than a "disqualified person") whose payments to the organization were more than \$5,000. For this purpose, "payer" includes, but is not limited to, any organization described in sections 170(b)(1)(A)(i) through (vi) and any governmental agency or bureau.

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?		X	A
Is the organization, or any part of it, a school?		X	B
Is the organization, or any part of it, a hospital or medical research organization?		X	C
Is the organization a section 509(a)(3) supporting organization?		X	D
Is the organization a private operating foundation?		X	E
Is the organization, or any part of it, a home for the aged or handicapped?		X	F
Is the organization, or any part of it, a child care organization?		X	G
Does the organization provide or administer any scholarship benefits, student aid, etc.?		X	H
Has the organization taken over, or will it take over, the facilities of a "for profit" institution?		X	I

Part IV Financial Data

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 Revenue and Expenses

	Current tax year	3 prior tax years or proposed budget for 2 years			(e) TOTAL
		(a) From 9/1/99 to 12/31/99	(b) 1/1/00 to 12/31/00	(c) 1/1/01 to 12/31/01	
Revenue	1 Gifts, grants, and contributions received (not including unusual grants—see page 6 of the instructions).	50,000	50,000	60,000	160,000
	2 Membership fees received	0	0	0	0
	3 Gross investment income (see instructions for definition)	0	600	500	1,100
	4 Net income from organization's unrelated business activities not included on line 3	0	0	0	0
	5 Tax revenues levied for and either paid to or spent on behalf of the organization	0	0	0	0
	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)	0	0	0	0
	7 Other income (not including gain or loss from sale of capital assets) (attach schedule)	0	0	0	0
	8 Total (add lines 1 through 7)	50,000	50,600	60,500	161,100
	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 513. Include related cost of sales on line 22	0	0	0	0
	10 Total (add lines 8 and 9)	50,000	50,600	60,500	161,100
	11 Gain or loss from sale of capital assets (attach schedule)	0	0	0	0
	12 Unusual grants	0	0	0	0
	13 Total revenue (add lines 10 through 12)	50,000	50,600	60,500	161,100
Expenses	14 Fundraising expenses	0	0	0	
	15 Contributions, gifts, grants, and similar amounts paid (attach schedule)	0	0	0	
	16 Disbursements to or for benefit of members (attach schedule)	0	0	0	
	17 Compensation of officers, directors, and trustees (attach schedule)	0	0	0	
	18 Other salaries and wages	9,400	40,000	40,000	
	19 Interest	0	0	0	
	20 Occupancy (rent, utilities, etc.)	500	3,000	3,000	
	21 Depreciation and depletion	0	0	0	
	22 Other (attach schedule)	10,500	27,400	23,400	
	23 Total expenses (add lines 14 through 22)	20,400	70,400	66,400	
	24 Excess of revenue over expenses (line 13 minus line 23)	29,600	(19,800)	(5,900)	

Part IV Financial Data (Continued)

B. Balance Sheet (at the end of the period shown)

Current tax year
Date June 22, 1999

Assets		
1	Cash	0
2	Accounts receivable, net	0
3	Inventories	0
4	Bonds and notes receivable (attach schedule)	0
5	Corporate stocks (attach schedule)	0
6	Mortgage loans (attach schedule)	0
7	Other investments (attach schedule)	0
8	Depreciable and depletable assets (attach schedule)	0
9	Land	0
10	Other assets (attach schedule)	0
11	Total assets (add lines 1 through 10)	0
Liabilities		
12	Accounts payable	0
13	Contributions, gifts, grants, etc., payable	0
14	Mortgages and notes payable (attach schedule)	0
15	Other liabilities (attach schedule)	0
16	Total liabilities (add lines 12 through 15)	0
Fund Balances or Net Assets		
17	Total fund balances or net assets	0
18	Total liabilities and fund balances or net assets (add line 16 and line 17)	0

If there has been any substantial change in any aspect of the organization's financial activities since the end of the period shown above, check the box and attach a detailed explanation

No Assets or Liabilities at this time.

ATTACHMENT B

The Tax Exempt Purpose of the Nikwasi Land Trust, Inc. is to conserve the natural, scenic, rural and historic character of the upper Little Tennessee Valley for the benefit of present and future generations.

All activities have or will occur in the Little Tennessee River Basin (Macon, Jackson, Swain Counties, NC or Rabun Co. Georgia. Work is done by Land Trust Staff (approx. 75%), by Board (approx. 15%) or by volunteers (approx. 10%).

1. **Activities which support the protection of important conservation land or historic resources in which the Nikwasi Land Trust does not hold legal interests in property. (35% of time)**
 - The Land Trust administers a river restoration project in which two partner organizations (the Little Tennessee Watershed Assoc. and the Macon Soil and Water Conservation District) execute a cost-share program to stabilize and reforest streambanks to improve water quality and wildlife habitat. Activity began in August 1998 and is funded for five years by the State of NC through a grant to the Land Trust's parent organization - the Southern Appalachian Highlands Conservancy.
 - The Land Trust helped rural residents to nominate their neighborhood as a Historic District on the National Register of Historic Places. Nomination was submitted to the NC Dept of Archives and History in March, 1999. Local property owners will be responsible for restoring & maintaining buildings within the district. Also the Land Trust is working with a local community club to restore an historic church building. The Cowee Community Club will be responsible for restoring and maintaining the church building. The Land Trust has worked since April of 1999 to raise funds and awareness about the project.
 - The Land Trust is facilitating the sale of a conservation easement on private land along the Little Tennessee River to the State of NC, Clean Water Management Trust Fund. This process began in September of 1998. The State will purchase and hold the easement to protect this land water quality and wildlife habitat on the river.

2. **Activities which directly protect land important for water quality or wildlife habitat in which the Nikwasi Land Trust will hold legal interests in property. (35% of time)**
 - The Land Trust is negotiating to purchase 60 acres of wetland and floodplain along the Little Tennessee River important for water quality and wildlife habitat. The Land Trust will own fee simple title to the land and be responsible for its management. Project began in Sept. of 1998 and should be consummated by the end of 1999.
 - The Land Trust has developed draft conservation easements for 280 acres of forest and river front lands within its project area. Landowners will donate easements to the Land Trust which will hold and monitor the easements in the future to protect these lands from inappropriate development.

3. **Inventory and Survey of important Conservation Lands & Public Education. (15% of time)**
 - The Land Trust is conducting a riparian land-use and botanical inventory along the Upper Little Tennessee River. This is being done by independent contractors - beginning in early 1998 and scheduled to be completed by late 2001. Information will be used to focus riparian restoration and preservation activities.
 - In 1998 the Land Trust used in-kind GIS skills to produce a 3-D map of the project area with federal and private land overlays.
 - The Land Trust plans to develop and distribute information to owners of important conservation lands in the project area concerning conservation options for private landowners.

4. **Secure Sources of Funding to Support the Land Trust Mission. (15% of time)**

The Land Trust Director has successfully written two grants to the State of NC for water quality protection and two others to private foundations to support operational expenses. The Land Trust also plans to recruit members to support the organization through dues and in-kind donations.

Attachment C.

BOARD OF DIRECTORS OF THE NIWASI LAND TRUST

**Paul Higdon 5650 Upper Burningtown Road
Franklin, NC 28734**

**Barbara McRae 266 Harrison Avenue
Franklin, NC 28734**

**Patricia Adams 996 Rt. 9-D
Garrison, NY 10524**

**Terry Breedlove P.O. Box 1422
Franklin, NC 28744**

**D. Lynn Cox 34 Wall St., Suite 802
Asheville, NC 28801**

**Susan Ervin 1120 Meadows Road
Franklin, NC 28734**

**Richard Heywood 645 Six Springs Road
Otto, NC 28763**

**Gary Kaufman 34 Old Clarks Chapel Road
Franklin, NC 28734**

**William McLarney 1120 Meadows Road
Franklin, NC 28734**

ATTACHMENT D

NIKWASI LAND TRUST EXPENSE VOUCHER

May 1999

Paul Carlson Office and Mileage Expenses (receipts attached):

1. Postage:	2.52 + 6.16 + 7.37	=	\$ 16.06
2. Photocopies & printer cartridge:	9.09 + 1.06 + 37.90	=	48.05
3. Telephone:	195.97	=	195.97
4. Internet:	19.95	=	19.95
5. Publications:	43.00 + 5.00	=	48.00
6. Camera, film, processing:	176.26 + 15.24 + 19.99	=	211.49
7. Mileage:		=	435.00

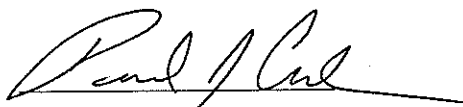
Subtotal: \$ 974.52

Paul Carlson contract for services:

100% time for the month of May = \$ 2666.66

INVOICE TOTAL: \$ 3641.18

Date of Invoice: June 1, 1999



Paul J. Carlson

Nikwasi Program Manager

ATTACHMENT E

OTHER EXPENSES
(Line 22 of Statement of Revenue and Expenses)

Expenses	9/1/99 - 12/31/99	1/1/00 - 12/31/00	1/1/01 - 12/31/01
Historic District Contracts	667	2000	1500
Inventory & Mapping Contracts	1000	4000	1500
Book-keeping & Audit	667	3000	3000
Staff Travel & Training	1500	4500	4500
Telephone & Office Supplies	1000	3000	3000
Office & field Equipment	1000	3000	2000
Subscriptions & Dues	400	1200	1200
Insurance	266	700	700
Land Monitoring & Stewardship Expenses	4000	6000	6000
TOTAL:	10,500	27,400	23,400

Form **872-C**

Consent Fixing Period of Limitation Upon Assessment of Tax Under Section 4940 of the Internal Revenue Code

OMB No. 1545-0056

(Rev. September 1998)

Department of the Treasury
Internal Revenue Service

(See instructions on reverse side.)

To be used with
Form 1023. Submit
in duplicate.

Under section 6501(c)(4) of the Internal Revenue Code, and as part of a request filed with Form 1023 that the organization named below be treated as a publicly supported organization under section 170(b)(1)(A)(vi) or section 509(a)(2) during an advance ruling period,

The Nikwasi Land Trust, Inc.

(Exact legal name of organization as shown in organizing document)

3257 Goshen Road Franklin, NC 28734

(Number, street, city or town, state, and ZIP code)

and the

District Director of
Internal Revenue, or
Assistant
Commissioner
(Employee Plans and
Exempt Organizations)

consent and agree that the period for assessing tax (imposed under section 4940 of the Code) for any of the 5 tax years in the advance ruling period will extend 8 years, 4 months, and 15 days beyond the end of the first tax year.

However, if a notice of deficiency in tax for any of these years is sent to the organization before the period expires, the time for making an assessment will be further extended by the number of days the assessment is prohibited, plus 60 days.

Ending date of first tax year *December 31, 1999*
(Month, day, and year)

Name of organization (as shown in organizing document)	Date
<i>The Nikwasi Land Trust, Inc.</i>	<i>June 22, 1999</i>
Officer or trustee having authority to sign	Type or print name and title
Signature ► <i>Richard D Heywood</i>	RICHARD D HEYWOOD TREASURER
For IRS use only	
District Director or Assistant Commissioner (Employee Plans and Exempt Organizations)	Date

By ►