

Internal Revenue Service
District Director

1100 COMMERCE STREET
DALLAS, TX 75242-0000

Date **FEB 22 1990**

UNICORN CENTERS INC
2910 BRIARCROFT
SAN ANTONIO, TX 78217

Department of the Treasury

MAR - 2 1990

400 085-110

Employer Identification Number
74-2354808

Contact Person
EO TECHNICAL ASSISTOR
Contact Telephone Number:
(214) 767-3526

Our Letter Dated:
September 6, 1985

Addendum Applies:
No

Dear Applicant

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

Your exempt status under section 501(a) of the Internal Revenue Code as an organization described in section 501(c)(3) is still in effect. Based on the information you submitted, we have determined that you are not a private foundation within the meaning of section 509(a) of the code because you are an organization of the type described in section 509(a)(2).

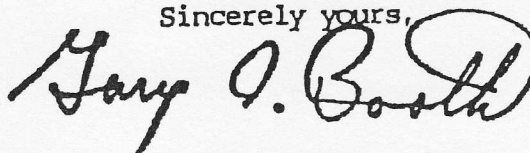
Grantors and contributors may rely on this determination unless the Internal Revenue Service publishes notice to the contrary. However, if you lose your section 509(a)(2) status, a grantor or contributor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act, or the substantial or material change on the part of the organization that resulted in your loss of such status, or if he or she acquired knowledge that the Internal Revenue Service had given notice that you would no longer be classified as a section 509(a)(2) organization.

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

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

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

Sincerely yours,



Gary O. Booth
District Director