



Department of the Treasury
Internal Revenue Service
Tax Exempt and Government Entities
P.O. Box 2508
Cincinnati, OH 45201

DARRYL CHAPPELL FOUNDATION
1899 L ST NW STE 850
WASHINGTON, DC 20036

Date:
06/27/2022
Employer ID number:
84-2779916
Document locator number (DLN):
29053272310011
60-month period begins:
January 1, 2022
60-month period ends:
December 31, 2026
Addendum applies:
No
Person to contact:
Name: Max DeWald
ID number: 4022646
Telephone: 877-829-5500

Dear Applicant:

We received your notification of intent to terminate your private foundation status under Internal Revenue Code (IRC) Section 507(b)(1)(B) during the 60-month period listed at the top of this letter. This letter could help resolve questions on your foundation status. Please keep it for your records.

You intend to operate as a public charity described in IRC Section(s) 501(c)(3) and 170(b)(1)(A)(vi) during the 60-month period. Based on your proposed activities and support, we agree you can terminate your private foundation status, and we'll treat you as a public charity as described in that Section for the 60-month advance ruling period.

Within 90 days after the end of your 60-month period, you must show you've met the requirements as a public charity described in IRC Section 509(a)(1), (2), or (3) for the 60-month period. If you show this, you'll be classified under that Section for all purposes from the beginning of the 60-month period and thereafter, as long as you continue to meet those requirements. Also, if you satisfy the requirements of IRC Section 507(b)(1)(B) at the end of your 60-month period, you won't be subject to the provisions of IRC Section 507(a), (c), or (g). However, if you don't meet these requirements for the 60-month period, you'll be classified as a private foundation for the entire period.

You'll be liable for interest under IRC Section 6601 if you don't pay the tax imposed by Section 4940 for any taxable years during the 60-month period and we subsequently determine you owe the tax for such years. However, we won't charge the penalty under Section 6651, with respect to the tax imposed by Section 4940, because failure to pay such taxes during the 60-month period is due to reasonable cause.

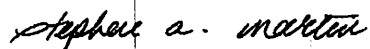
You're required to file Form 990-PF, Return of Private Foundation or Section 4947(a)(1) Trust Treated as Private Foundation, until you complete your 60-month termination and are classified as a public charity.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

Grantors and contributors can rely on this determination that you're not a private foundation until 90 days after the end of your advance ruling period. If you submit the required information within the 90 days, they can continue to rely on this letter until we make a final determination of your foundation status.

We sent a copy of this letter to your representative as indicated in your power of attorney.

Sincerely,



Stephen A. Martin
Director, Exempt Organizations
Rulings and Agreements

Enclosures:
Form 872-b



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Internal Revenue Service
Tax Exempt and Government Entities
PO Box 2508
Cincinnati, OH 45201

CAPLIN & DRYDALE CHTD
C/O MEGHAN R BISS
ONE THOMAS CIRCLE NW STE 1100
WASHINGTON, DC 20005

Date:
06/27/2022
Taxpayer ID number:
84-2779916
Taxpayer or applicant name:
DARRYL CHAPPELL FOUNDATION
Form or application number:
8940
Person to contact:
Name: Max DeWald
ID number: 4022646
Telephone: 877-829-5500

Dear Representative:

We're sending the enclosed material to you because of a power of attorney or other authorization we have on file.

If you have questions, contact the person listed at the top of this letter.

Sincerely,

Stephen A. Martin

Director, Exempt Organizations
Rulings and Agreements

Enclosures:
Letter 2245
Form 872-b