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9/3/69

FORM 1023  
(Rev. April 1965)

U.S. TREASURY DEPARTMENT—INTERNAL REVENUE SERVICE

**EXEMPTION APPLICATION**

(To be made only by a principal officer of the organization claiming exemption)

To be filed in duplicate with the District Director for your District.

For use of organizations applying for exemption under section 501(a) and described in section 501(c)(3) of the Internal Revenue Code, which are organized and operated (or will operate) exclusively for one or more of the following purposes (check purpose(s)):

- Religious
- Charitable
- Educational
- Scientific
- For the prevention of cruelty to children or animals
- Testing for Public Safety
- Literary

Every organization that claims to be exempt must furnish the information and data specified in duplicate. If any organization fails to submit the information and data required, this application will not be considered on its merits and the organization will be notified accordingly.

This application shall be open to public inspection in accordance with section 6104(a)(1) of the Internal Revenue Code. See separate instructions for Form 1023 to properly answer the questions below.

1a. Full name of organization  
BAPTIST TOWERS OF JACKSONVILLE, INC.

1b. Employer identification number

2. Complete address (number, street, city or town, State and Postal ZIP code)  
Hendricks Avenue Baptist Church, 4001 Hendricks Ave. Jacksonville, Fla. 32207

3a. Is the organization incorporated?  
 Yes  No

3b. If "Yes," in which State and under which law (General corporation, not for profit, membership, educational, eleemosynary, etc.)? Cite statutory provisions.  
Florida, Chapter 617 Florida Statutes, 1967.

4a. If not incorporated, what is form of organization?

4b. Date incorporated or organized  
Feb. 25, 1969

4c. Month and day on which the annual accounting period ends

5a. Has organization filed Federal income tax return(s)?  Yes  No

5b. If "Yes," (and number of return filed and Internal Revenue District where filed)

5c. Year(s) filed

6. After July 1, 1950, did the creator of your organization (if a trust), or a contributor to your organization, or a brother or sister (whole or half blood), spouse, ancestor, or lineal descendant of such creator or contributor, or a corporation controlled directly or indirectly by such creator or contributor, enter into any of the transactions (or activities) enumerated below? NOTE: If you have any knowledge or contemplation that you will be a party to any of the transactions (or activities) enumerated in 6a through 6f, check "planned" in the applicable block(s) and see instructions.

	Yes	No	Planned		Yes	No	Planned
a. Borrow any part of your income or corpus?		X		d. Purchase any securities or other property from you?		X	
b. Receive any compensation from you?		X		e. Sell any securities or other property to you?		X	
c. Have any part of your services made available to him?		X		f. Receive any of your income or corpus in any other transaction?		X	

7. Have you issued or do you plan to issue membership, stock, or other certificates evidencing voting power in the organization? Yes No  
X

8a. Are you the outgrowth or continuation of any form of predecessor(s)? X

8b. Do you have capital stock issued and outstanding? X

8c. Have you made or do you plan to make any distribution of your property to shareholders or members? X

8d. Did you receive or do you expect to receive 10 percent or more of your assets from any organization (including affiliated organizations (affiliated through holding common ownership, or otherwise), any individual, or member of a family group (brother or sister whether whole or half blood, spouse, ancestor, or lineal descendant)? X

8e. Does any part or will any part of your present or anticipated net income represent payment for services of any character rendered or to be rendered by you? X

8f. Are you now, have you ever been, or do you plan to be engaged in carrying on propaganda, or otherwise advocating or opposing pending or proposed legislation? X

8g. Do you participate or plan to participate in or intervene in (including the publishing or distributing of statements) any political campaign on behalf of or in opposition to any candidate for public office? X

8h. Have you made or do you plan to make any payments to members or shareholders for services rendered or to be rendered? X

8i. Does any part or do you plan to have any part of your net income inure to the benefit of any private shareholder or individual? X

8j. Are you now or are you planning to be affiliated in any manner with any organization(s)? X

8k. Do you hold or plan to hold 10 percent or more of any class of stock or 10 percent or more of the total combined voting power of stock in any corporation? X

REC'D  
 AUG 28 1969  
 DIRECTOR, INTERNAL REVENUE  
 AUDIT DIVISION  
 JACKSONVILLE DISTRICT OFFICE  
 501 S. BAY ST.  
 JACKSONVILLE, FLA. 32202

9. Has any State or any court (including a Court of Probate, Surrogate's Court, etc.) ever declared whether you were or were not organized and operated for charitable, etc., purposes?  Yes  No. If "Yes," attach copies in duplicate of pertinent administrative or judicial decisions.

10. You must attach copies in duplicate of the following:

- a. If incorporated, a copy of your articles of incorporation, or if not incorporated, a copy of your constitution, articles of association, declaration of trust, or other document whereby you were created setting forth your aims and purposes, a copy of all amendments thereto, and any changes presently proposed.
- b. A copy of your bylaws or other similar code of regulations, all amendments thereto, and any changes presently proposed.
- c. A complete statement of assets and liabilities as of the end of each annual accounting period (or as of the date of the filing of this application, if you were in existence for less than a year).
- d. A statement of receipts and expenditures for each annual accounting period of operation (or for the period for which you were in existence, if less than a year).
- e. A statement which clearly indicates what State statutes or court decisions govern the distribution of assets upon dissolution. (This statement may be omitted if your charter, certificate, or other instrument of organization makes provision for such distribution.)
- f. A brief statement of the specific purposes for which you were formed. (Do not quote from or make reference to your articles of incorporation, constitution, articles of association, declaration of trust, or other document whereby you were created for this question.)
- g. A statement explaining in detail each fund-raising activity and each business enterprise you have engaged in or plan to engage in, accompanied by copies of all agreements, if any, with other parties for the conduct of each fund-raising activity or business enterprise.
- h. A statement which describes in detail the nature of each of your activities which you have checked on page 1, activities which you sponsor, and proposed activities.
- i. A statement which explains fully any specific activities that you have engaged in or sponsored and which have been discontinued. Give dates of commencement and termination and the reasons for discontinuance.
- j. A statement which describes the purposes, other than in payment for services rendered or supplies furnished, for which your funds are expended or will be expended.
- k. A schedule indicating the name and position of each officer, director, trustee, etc., of the organization and the relationship, if any, by blood, marriage, adoption, or employment, of each such person to the creator of the organization (if a trust), to any person who has made a substantial contribution to the organization, or to a corporation controlled (by ownership of 50 percent or more of voting stock or 50 percent or more of value of all stock), directly or indirectly, by such creator or contributor. The schedule shall also indicate the time devoted to position and compensation (including salary and expense account allowance), if any, of each officer, director, trustee, etc., of the organization.
- l. A copy of each lease, if any, in which you are the lessee or lessor of property (real, personal, gas, oil, or mineral) or in which you own an interest under such lease, together with copies of all agreements with other parties for development of the property.

**SIGNATURE AND VERIFICATION**

Under penalties of perjury, I declare that I have examined this application, including accompanying statements, and to the best of my knowledge and belief it is true, correct, and complete.

Aug 7 1969      [Signature]      [Signature]  
Date                      Signature of officer                      Title

BAPTIST TOWERS OF JACKSONVILLE, INC.

ATTACHMENT TO FORM 1023

8e. As later explained in more detail, the proposed operation is the furnishing of low-cost rental housing and related care to low-moderate income elderly people. Rentals will be received from these tenants.

8j. The corporation is affiliated with and sponsored by:

Central Baptist Church  
1318 Nira Street, Jacksonville

Hendricks Avenue Baptist Church  
4001 Hendricks Avenue, Jacksonville

North Jacksonville Baptist Church  
6415 Pearl Street, Jacksonville

Riverside Baptist Church  
2650 Park Street, Jacksonville

Southside Baptist Church  
1435 Atlantic Blvd. Jacksonville

"Sponsorship" is best defined by materials included in Supplement # 1 to Loan Application which is enclosed.

10c and 10d. Attached as Exhibit "A".

10e. The Articles of Incorporation make provision for distribution of assets upon dissolution.

10f. The corporation was formed for the sole purpose of constructing and operating a low rent apartment facility in City of Jacksonville, Florida; such apartment facility to be constructed with funds loaned by the Federal Government under Section 202 of the Housing Act of 1959 and occupancy to be limited to persons sixty-two years of age, or older, who are in the low-moderate income bracket. Income limitations are established by the U. S. Department of Housing and Urban Development. Current established maximum income limits for the Jacksonville area are: \$4,185 per annum (one person) and \$5,130 per annum (couple).

10g. The corporation has not engaged in business or fundraising activities and has no such plans for the future.

10h. The corporation proposes to construct a 203 unit apartment building on a site in Jacksonville, Florida, ideally located for a residence for elderly persons. The loan of funds by the Federal Government under Section 202 of the Housing Act of 1959 at 3% per annum interest, repayable over a term of fifty years, together with the application of rentals received solely for the cost of operation, makes it possible to provide suitable and safe housing for elderly people in the low-moderate income brackets who could not otherwise afford proper housing and related care. Operation of the apartment facility will be in accordance with the requirements of the U.S. Department of Housing and Urban Development as established by the loan and regulatory agreements to be entered into between the Federal Government and the corporation.

Except for initial escrow for first year operations and funds for purchase of movable furnishings and equipment (both to be provided by the sponsoring organizations) revenues will consist primarily of rentals paid by residents. A small amount of revenue will be realized from lease of space for coin-operated washer-dryer equipment. All revenues will be used solely for cost of operation, maintenance and repayment of the Federal loan.

The apartment building facility will contain 203 apartments of which 101 will be one bedroom apartments and 102 will be efficiency units. Residential capacity will be approximately 303 persons. Apartments will be equipped with emergency signaling device and will include, in addition, recognized methods of construction and specialized equipment for the convenience and safety of the elderly.

Criteria for admission are: age of sixty-two or older and an annual income not in excess of Forty-one Hundred Eighty-five Dollars (\$4,185) for a one-person family or Fifty-one Hundred Thirty Dollars (\$5,130) maximum for a two-person family. The maximum income limitation is established by the U. S. Department of Housing and Urban Development. Preference will be shown those applicants who manifest most dire housing need.

There will be no admission fee or entrance fee charged. Monthly rentals will average an estimated \$80.00 per month for efficiency units and \$98.00 per month for one bedroom units. These figures include all utility costs. Rents are payable monthly. Apartments are not furnished, except for carpeting and built-in kitchen equipment.

In addition to the apartment dwelling units, the building will provide an examination room (clinic), laundry facility, community activities room, and other recreational areas. Central dining facilities are not provided.



To the extent not inconsistent with maintaining sufficient financial reserves to provide for the continued existence of the corporation and effective pursuit of its purposes the corporation will admit as a resident any otherwise qualified elderly person who is deserving and needful of assistance, without regard to such person's ability to contribute to the cost of his or her care and maintenance in the corporation's apartment facility.

Other Baptist service and welfare undertakings have been the object of donations, gifts and bequests in substantial magnitude and there is every reason to believe that such will be the case as regards Baptist Towers of Jacksonville, Inc. Obviously, the number and amount of future gifts and bequests is not susceptible of precise calculation or even of reasonable estimation at this time. However, the combination of commitment by the Sponsor-Churches coupled with the anticipated receipt of substantial gifts and bequests tends to evidence that Baptist Towers of Jacksonville, Inc., will be enabled to assist residents whose financial means are, or will in the future be, insufficient to make payments in accordance with published rent schedule.

Rental charges will be on a basis of less than recovery costs.

Federal direct loan financing has been applied for under Section 202 of the Housing Act of 1959.

No admission applications, literature or brochures have been created.

10i. No activities have been engaged in or sponsored and subsequently discontinued.

10j. All funds will be expended for payment of services rendered or supplies furnished.... and for no other purposes.

10k. The Officers and Directors of the Corporation are: President and Director, Clyde B. Lipscomb, Vice-President and Director, Marion Gooding, Secretary and Director, S. Oscar Bean, Treasurer and Director Robert G. Witty; Directors are: Edgar R. Cooper, C. B. Carroll, Emmett F. Ferguson, Jr., E. H. Harty, Henry W. Hill, J. Earl Huntley, Malcomb B. Knight, Hal Lynch, Jr. Gilbert Ponsell, Jr., James Hilton Olive, Robert H. Rowe, Jr. Robert H. Spiro, J. G. Trantham, Jr, Judson S. Whorton, Robert Mein, W. Ashley Verlander, Robert A. Thornton, Joe Adams, W. Roy Hancock and Marion Waters.

10l. Not applicable.