From:	Ian Oliver Martin
To:	Preston Christie A
Subject:	Form 990
Date:	Friday, September 11, 2015 4:24:59 PM

Internal Revenue Service
Attn: Christie A. Preston
1111 Constitution Avenue NW, Rm 6129
Washington, DC 20224.

This is a reponse to:

The Internal Revenue Service and Treasury Department are seeking public comment about the Form 990, which secular non-profit organizations are required to file each year to retain their tax exemption. The 990 informational return requires non-profits to report their annual gross income, disbursements and other tax information to the IRS — and to the U.S. public which subsidizes tax-exempt organizations. The IRS estimates that the burden on non-profits filing a 990 return amounts to more than 25 million hours. Yet churches are automatically exempted from this onerous requirement under federal law. This discrepancy shields churches from accountability and amounts to government favoritism toward religion.

As you may be aware, the Freedom From Religion Foundation started a federal challenge against discrepant treatment by the IRS of non-church groups. Although our case was thrown out on "standing," we are recalibrating and plan to refile the challenge soon. This public comment period gives you as an FFRF member a chance to influence the IRS to reform its discriminatory treatment of non-church groups. Please help!

In a September 10 letter to the IRS, the Freedom From Religion Foundation points out that the IRS provides unequal treatment to secular non-profits. FFRF asks the IRS to limit the broad exemption granted to churches. Churches and religious organizations currently do not even have to send a notice to the IRS that they are claiming a 990 filing exemption! Any group that claims it is religious avoids all public transparency and accountability.

This is precisely the type of lack of oversight that allows for widespread abuse, preying upon vulnerable populations, and fraud. It is time to tell the IRS to stop privileging churches at public expense.

The IRS and Treasury Department are asking the public to comment on Form 990. Among other questions, they have asked for "ways to enhance the quality, utility, and clarity" of the 990 information collected.

FFRF's comment provides two suggested immediate changes:

1) Any IRS oversight of 501(c)(3) organizations must be equally enforced against religious organizations.

2) The IRS should, at the very minimum, require church entities claiming exemption from filing the 990 to inform the IRS through a letter (or via a prescribed form).

Sincerely.

Ian Oliver Martin

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http://ffrf.org/news/action/item/23948-ask-irs-to-stop-favoring-churches-over-other-non-profits