

Application for Recognition of Exemption

Under Section 501(c)(3) of the Internal Revenue Code

OMB No. 1545-0048
 If exempt status is approved, this application will be open for public inspection.

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 7 of the instructions.

Part I Identification of Applicant

1a Full name of organization (as shown in organizing document): The JSW Adoption Foundation, Inc.		2 Employer identification number (EIN) (If none, see page 2 of the instructions.) 39-1863217	
1b c/o Name (if applicable) 00123		3 Name and telephone number of person to be contacted if additional information is needed Bradley J. Sebena, CPA (414) 792 2000	
1c Address (number and street) 127 E. Main Street		Room/Suite 5	
1d City or town, state, and ZIP code Port Washington WI 53074		4 Month the annual accounting period ends December	
5 Date incorporated or formed Aug. 19, 1996	6 Activity codes (See page 3 of the instructions.) 561	7 Check here if applying under section: <input type="checkbox"/> a 501(c) <input type="checkbox"/> b 501(f) <input checked="" type="checkbox"/> c 501(k)	
8 Did the organization previously apply for recognition of exemption under this Code section or under any other section of the Code? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If "Yes," attach an explanation.			
9 Is the organization required to file Form 990 (or Form 990-EZ)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If "No," attach an explanation (see page 3 of the Specific Instructions).			
10 Has the organization filed Federal income tax returns or exempt organization information returns? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If "Yes," state the form numbers, years filed, and Internal Revenue office where filed.			

11 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 11, on page 3. Get Pub. 557, Tax-Exempt Status for Your Organization, 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.
- 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 creation 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 **_____**

Please Sign Here

[Handwritten Signature]

10-17-96

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 attached narrative regarding proposed operations of the foundation

- Also attached - By-laws of the Foundation
- Articles of incorporation
- Consent minutes of directors

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

3 Describe the organization's fundraising program, both actual and planned, and explain to what extent this program has been put into effect. Include details of fundraising activities such as: relative methods, identification of fund-raising committees, board of volunteers or professional fundraisers, etc. Attach representative copies of solicitation materials if supported.
none - see attached

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	b Annual compensation
(1) Eugene T. Wyka, 751 Lancaster Ct. Grafton, WI 53024. president and director	0
(2) Lucy M. Wyka, 751 Lancaster Ct. Grafton, WI 53024 vice president, secretary and director	0
(3) Eugene J. Wyka, PO Box 175, Haugen, WI 54841 director	0

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:
 see attached, all officers and directors are substantial contributors and hence are "disqualified persons"

5 Does the organization control or is it controlled by any other organization? Yes No
 Is the organization the cutgrowth 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

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.

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"

n/a - only assets will be cash and investment producing income properties Yes No

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? 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 Yes No

11 Is the organization a membership organization? If "Yes," complete the following a Describe the organization's membership requirements and attach a schedule of membership fees and dues. Yes No

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. see attached - the foundation will reimburse only a limited amount of adoption expenses incurred by the adopting family.

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. see attached

13 Does or will the organization attempt to influence legislation? 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. Yes No

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

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 7 below

2 If one of the exceptions to the 15-month filing requirement shown below applies, check the appropriate box and proceed to question 8

- 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 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 section 401 of Rev. Proc. 92-85, 1992-2 CB. 490, for an automatic 12-month extension of the 15-month filing requirement. Do not answer questions 4 through 7.
If "No," answer question 4

4 If you answer "No" to question 3, has the organization been contacted by the IRS regarding its failure to file Form 1023 within 27 months from the end of the month in which the organization was created or formed? Yes No
If "No," your organization is requesting an extension of time to apply under the "reasonable action and good faith" requirements of section 501 of Rev. Proc. 92-85. Do not answer questions 5 through 7.
If "Yes," answer question 5

5 If you answer "Yes" to question 4, does the organization wish to request relief from the 15-month filing requirement? Yes No
If "Yes," give the reasons for not filing this application prior to being contacted by the IRS. See Specific Instructions, Line 5, on page 4 before completing this item. Do not answer questions 6 and 7.
If "No," answer question 6

6 If you answer "No" to question 5, your organization's qualification as a section 501(c)(3) organization can be recognized only from the date this application is filed with your Key District Director. 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

7 If you answer "Yes" to question 6 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 of Form 1024 to this application.

Part III Technical Requirements (Continued)

- 8 Is this organization a private foundation?
 Yes (Answer question 9)
 No (Answer question 10 and proceed as instructed)

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

After answering question 9 on this line, go to line 14 on page 1

- 10 If you answer "No" to question 8, 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 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 As a school (MUST COMPLETE SCHEDULE B.) Sections 509(a)(1) and 170(b)(1)(A)(ii)
- c As a hospital or a cooperative hospital service organization, or a medical research organization operated in conjunction with a hospital (MUST COMPLETE SCHEDULE C.) Sections 509(a)(1) and 170(b)(1)(A)(iii)
- d As a governmental unit described in section 170(c)(1). Section 509(a)(3)
- e 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)(4)
- f As being organized and operated exclusively for testing for public safety. Sections 509(a)(1) and 170(b)(1)(A)(iv)
- g 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)(v)
- h 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. Section 509(a)(2)
- i 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). Sections 509(a)(1) and 170(b)(1)(A)(vi) or Section 509(a)(2)
- j The organization is a publicly supported organization but is not sure whether it meets the public support test of block h or block i. The organization would like the IRS to decide the proper classification. Section 509(a)(2)

If you checked one of the boxes a through i in question 10, go to question 15.
 If you checked box j in question 10, go to questions 12 and 13.
 If you checked box h, i, or j in question 10, go to question 11.

Part III Technical Requirements (Continued)

- 11 If you checked box b, i, or j on line 10, has the organization completed a tax year of at least 9 months?
 - Yes - Indicate whether you are requesting:
 - A definitive ruling (Answer questions on lines 12 through 15)
 - An advance ruling (Answer questions on lines 12 and 15 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 application.

12 If the organization received any unusual grants during any of the tax years shown in Part IV-A, 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

13 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 13a above

- 14 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 3 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.

15 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

Form 990 (Rev. 4-98)

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				(e) TOTAL
		Current tax year	3 prior tax years or proposed budget for 2 years			
		(a) From 8/19 to 12/31	(b) 19 97	(c) 19 98	(d) 19	
Revenue	1	50,000	50,000	50,000		50,000
	2					
	3		1,000	1,000		2,000
	4					
	5					
	6					
	7					
	8					
	9					
	10		50,000	51,000	51,000	52,000
Expenses	11					
	12					
	13		50,000	51,000	51,000	52,000
	14					
	15		0	90,000	45,000	
	16					
	17					
	18					
	19					
	20					
21		1,000	1,000	1,000		
22						
23		1,000	1,000	1,000		
24		49,000	40,000	5,000		

Part IV Financial Data (Continued)

* Projected

Current tax year
Date 12/31/96

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

Assets	
1 Cash	50,000
2 Accounts receivable, net	
3 Inventories	
4 Bonds and notes receivable (attach schedule)	
5 Corporate stocks (attach schedule)	
6 Mortgage loans (attach schedule)	
7 Other investments (attach schedule)	
8 Depreciable and depletable assets (attach schedule)	
9 Land	
10 Other assets (attach schedule)	
11 Total assets (add lines 1 through 10)	50,000
Liabilities	
12 Accounts payable	
13 Contributions, gifts, grants, etc., payable	
14 Mortgages and notes payable (attach schedule)	
15 Other liabilities (attach schedule)	
16 Total liabilities (add lines 12 through 15)	
Fund Balances or Net Assets	
17 Total fund balances or net assets	50,000
18 Total liabilities and fund balances or net assets (add line 16 and line 17)	50,000

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

* At Date of Filing, No Audit or Indication AS OF 10/2/96 That 50K Amount Was Projected Cash Balance at Fiscal Year End

Schedule E. Private Operating Foundation

		Most recent tax year
Income Test		
1a Adjusted net income, as defined in Regulations section 53.4942(a)-2(d)	1a	
b Minimum investment return, as defined in Regulations section 53.4942(a)-2(c)	1b	
2 Qualifying distributions:		
a Amounts (including administrative expenses) paid directly for the active conduct of the activities for which organized and operated under section 501(c)(3) (attach schedule)	2a	
b Amounts paid to acquire assets to be used (or held for use) directly in carrying out purposes described in section 170(c)(1) or 170(c)(2)(B) (attach schedule)	2b	
c Amounts set aside for specific projects that are for purposes described in section 170(c)(1) or 170(c)(2)(B) (attach schedule)	2c	
d Total qualifying distributions (add lines 2a, b, and c)	2d	
3 Percentages:		
a Percentage of qualifying distributions to adjusted net income (divide line 2d by line 1a)	3a	%
b Percentage of qualifying distributions to minimum investment return (divide line 2d by line 1b) (Percentage must be at least 85% for 3a or 3b)	3b	%
Assets Test		
4 Value of organization's assets used in activities that directly carry out the exempt purposes. Do not include assets held merely for investment or production of income (attach schedule)	4	
5 Value of any stock of a corporation that is controlled by applicant organization and carries out its exempt purposes (attach statement describing corporation)	5	
6 Value of all qualifying assets (add lines 4 and 5)	6	
7 Value of applicant organization's total assets	7	
8 Percentage of qualifying assets to total assets (divide line 6 by line 7 - percentage must exceed 65%)	8	%
Endowment Test		
9 Value of assets not used (or held for use) directly in carrying out exempt purposes		
a Monthly average of investment securities at fair market value	9a	
b Monthly average of cash balances	9b	
c Fair market value of all other investment property (attach schedule)	9c	
d Total (add lines 9a, b, and c)	9d	
10 Acquisition indebtedness related to line 9 items (attach schedule)	10	
11 Balance (subtract line 10 from line 9d)	11	
12 Multiply line 11 by 3 1/3% (2/3 of the percentage for the minimum investment return computation under section 4942(e)). Line 2c above must equal or exceed the result of this computation	12	
Support Test		
13 Applicant organization's support as defined in section 509(d)		
14 Gross investment income, as defined in section 509(e)	14	
15 Support for purposes of section 4942(j)(3)(B)(ii) (subtract line 14 from line 13)	15	
16 Support received from the general public, five or more exempt organizations, or a combination of these sources (attach schedule)	16	
17 For persons (other than exempt organizations) contributing more than 1% of line 15, enter the total amounts that are more than 1% of line 15	17	
18 Subtract line 17 from line 16	18	
19 Percentage of total support (divide line 18 by line 15 - must be at least 85%)	19	%
20 Does line 16 include support from an exempt organization that is more than 25% of the amount of line 15?	Yes	No
21 Newly created organizations with less than 1 year's experience. Attach a statement explaining how the organization is planning to satisfy the requirements of section 4942(j)(3) for the income test and one of the supplemental tests during the 1st year of operation. Include a description of plans and arrangements, press clippings, public announcements, solicitations for funds, etc.		
22 Does the amount entered on line 2a above include any grants that the applicant organization made? If "Yes," attach a statement explaining how those grants satisfy the criteria for "significant involvement" grants described in section 53.4942(b)(1)(B)(2) of the Regulations.	Yes	No

For more information, see back of Schedule E