# APPLICATION FOR TAX EXEMPTION MADISON COUNTY TAX ASSESSOR MADISON COUNTY BOARD OF SUPERVISORS

#### **Instructions:**

Before you apply for a Tax Exemption please read the attached Qualifications for Tax Exemption in Mississippi (§27-31-1, et seq., MS Code of 1972 Annotated), and then answer the following questions to be considered for Tax Exemption. Applicant must be the owner of record as of January 1 of the initial tax year for request. Applications must be submitted by June 1 of the initial tax year for request.

1.	APPLICANT FOR TAX EXEMPTION: John D. Damon
2.	ADDRESS OF PROPERTY: Ridgeland, MS 39157
	PARCEL#:
4.	DATE PROPERTY ACQUIRED: 3/11/2022
5.	INITIAL TAX YEAR FOR REQUEST: 2025
6.	ARE ANY PROPERTY TAXES CURRENTLY DUE FOR THIS PROPERTY (CIRCLE ONE): YES / NO
	a. If Yes, list the tax years with taxes currently due and owing:
7.	REASON FOR TAX EXEMPTION: Non-profit
	IF THE EXEMPTION CLAIM IS FOR A CHURCH PLEASE

A religious society, ecclesiastical body and/or any congregation thereof may hold and own the following real property, but no other.

CONSIDER THE FOLLOWING CODE SECTION 79-11-33 MS

CODE OF 1972 ANNOTATED:

- a. A building used as a place of worship with a reasonable quantity of ground annexed thereto;
- b. A quantity of ground annexed to the building used as a place of worship and used as a parish house; a community facility; a Sunday school facility; an educational facility; or for the care of children on a non-profit basis;

- c. As a hospital or infirmary together with a reasonable amount of ground annexed thereto;
- d. All buildings used as a school or college or seminary of learning;
- e. All buildings used for an orphan asylum or institution;
- f. All buildings used for a campground or assembly for religious purposes;
- g. lands for a cemetery of sufficient dimensions;
- h. All buildings and grounds used for denominational headquarters and/or administrative purposes;
- i. Any land which is maintained and used as a parking lot for the convenience of the members of the congregation, church, cathedral, mission, or other unit or administrative unit from which the society receives NO REVENUE, fee, charge or assessment
- 9. IF THE EXEMPTION CLAIM IS FOR A CHURCH WHICH OF THE ABOVE QUALIFIES THE CHURCH PROPERTY FOR TAX EXEMPTION:

10. IF THE EXEMPTION CLAIM IS FOR A CHURCH ARE ALL PROPERTIES CLAIMED ANNEXED TO THE CHURCH: YES/NO;

11. IF THE EXEMPTION CLAIM IS FOR A CHURCH AND THE PROPERTY CLAIMED FOR EXEMPTION IS NON-CONTIGUOUS OR NOT ANNEXED TO THE CHURCH PROPERTY WHAT IS THE PURPOSE FOR THE EXEMPTION AND IS THE PURPOSE FOR A NON-PROFIT BENEFIT:

12. IF THE EXEMPTION CLAIM IS FOR A NON-PROFIT PLEASE PROVIDE THE IRS EXEMPTION LETTER OR PROVIDE THE IRS

13. IS THE NON-PROFIT INCORPORATED: YES/NO:

**EXEMPTION #:** 

14. IF YES ATTACH COPY OF CHARTER FROM MS SEC OF STATE:

15. If your organization is receiving rent or some equivalent thereof for use	,
of some of all of the real property for which you are requesting an	
exemption, please provide the amount of rent collected and what	
percentage of the property is being rented or leased;	

16. If your organization is allowing other groups to use the property for a fee, please provide a detailed description of the groups utilizing the property, the fees associated with that usage, and the estimated percentage of the calendar year when the property is utilized by other organizations;

17. If your organization provides services for a fee, please describe the fee structure and identify what portion of your clientele (a) pay a reduced fee and/or (b) do not pay any fee for the service;

18. Review the attached copy of Mississippi statute (Section 27-31-1) and list the specific section of that law that applies to your organization; 27-31-1(d)

19. Please attach or enclose any other information that will support your Application for tax exemption status.

The undersigned, individual owner(s) of the property (the Pastor and one Deacon if a Church, or the church Business Manager), or an authorized officer of the company that owns the property, certifies that, to the best of his/her knowledge, no information contained hereinabove or in the attachments hereto is false in any way and that all information is truly descriptive of the property and the development for which this application for tax exemption is being submitted.

### OWNER OR AUTHORIZED REPRESENTATIVE:

John D. Damon, PhD Print Name	
PASTOR	
DEACON	
CARES Center, Inc. Company or Organization Name	Title
169-777-1500 Telephone	Jamonomy canopy.org
Signature	1-23-24 Date

**CANOPY LEGAL** 



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CARES CENTER INC DBA CANOPY CHILDREN'S SOLUTIONS
PO BOX 1078

JACKSON MS 39215-1078

Date: November 06, 2024 Letter ID: L0123971872

Reference: Sales Tax Exemption Letter Ruling Number: 24-0537

This is in response to your letter dated October 31, 2024, requesting that the Mississippi Department of Revenue provide a ruling regarding whether the Cares Center Inc dba Canopy Children's Solutions is exempt from Mississippi sales and use tax. Your request has been assigned the letter ruling number listed above. Please use this number in any further correspondence with the DOR concerning this request.

After a search of the applicable statutes, this is to confirm that the Cares Center Inc dba Canopy Children's Solutions does qualify for sales tax exempt status pursuant to Miss. Code Ann. Section 27-65-111(a). This Section provides that sales of tangible personal property or services to hospitals or infirmaries owned and operated by a corporation or association in which no part of the net earnings inures to the benefit of any shareholder, group or individual, and which are subject to and governed by Miss. Code Ann. Section 41-7-123 through Section 41-7-127, are exempt from sales tax. As a prerequisite to exemption, the sale of property or charge for services must be sold directly to, billed directly to, and paid for directly by the exempt entity. The exemption applies to purchases of tangible personal property and taxable services that are ordinary and necessary to the operation of the exempt entity.

However, any department or division of an exempt entity, whether located on site or off-site, which is not ordinary and necessary to the operation of the exempt entity, is not covered under the exemption granted and is subject to the applicable rate of sales tax on its purchases. This includes, but is not limited to, wellness centers, physician's offices, and clinics.

This exemption does not apply to sales of tangible personal property or services to contractors purchased in the performance of contracts with the exempt entity, even if the contractor or employee may be relimbursed for the expense by the exempt entity. Furthermore, this exemption does not apply to Contractor's Tax levied by Miss. Code Ann. Section 27-85-21.

You may use a copy of this letter in order to substantiate the Cares Center Inc dba Canopy Children's Solutions' exempt status. I trust that this is the information you were requesting. Should you have any additional questions, feel free to contact this office at (601) 923-7015.

Under Miss. Code Ann. Section 27-65-85(a), it shall be unlawful for any person to use an exemption authorized under the Sales Tax laws for the purpose of avoiding the payment of tax the person is required to pay by law. Any person violating this provision shall be guilty of a misdemeanor and, on conviction thereof, shall be fined not more than Five Hundred Dollars (\$500.00), or imprisoned not exceeding six (6) months in the county Jall, or punished by both such fine and imprisonment, at the discretion of the court.

O.H

This letter ruling is based on the specific facts and circumstances that you communicated to the DOR. This ruling is not

P.O. Box 1033, Jackson, MS 39215 Phone: (601) 923-7700 Fax: (601) 923-7714

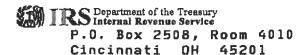
binding on the DOR if these facts and circumstances are inaccurate, contain a material omission of a relevant fact or facts to the issue(s) presented or if such facts and circumstances change. This letter ruling is also only valid for seven (7) years from the date of this letter. At the end of this seven (7) year period, you are free to update your information and request another letter ruling if you wish. This ruling is only applicable to you or to your client if you are requesting this ruling on behalf of another and can only be relied upon by the person for whom the ruling was requested.

If the facts and circumstances presented in your request are accurate, complete and do not change for the seven (7) year period indicated above, the person for whom it was requested can rely upon this ruling unless and until there is a change in the law or regulation or the issuance of judicial decision that indicates the ruling is no longer correct or the DOR retracts the ruling. The DOR does reserve the right to retract this ruling if it later determines on its own review that the ruling is incorrect. Such retraction will be in writing and the effect of the retraction will be prospective from the date of the retraction letter.

Sincerely,

Rhonda Williams (601) 923-7029 Mississippi Department of Revenue





In reply refer to: 4077952422 June 12, 2018 LTR 4168C 0 64-0823550 000000 00

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BODC: TE

CARES CENTER INC
DBA CANOPY CHILDRENS SOLUTIONS
PO BOX 1078
JACKSON MS 39215



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Employer ID number: 64-0823550 Form 990 required: Yes

Dear Taxpayer:

We're responding to your request dated Apr. 18, 2018, about your tax-exempt status.

We issued you a determination letter in July 1995, recognizing you as tax-exempt under Internal Revenue Code (IRC) Section 501(c) (3).

We also show you're not a private foundation as defined under IRC Section 509(a) because you're described in IRC Sections 509(a)(1) and 170(b)(1)(A)(ii).

Donors can deduct contributions they make to you as provided in IRC Section 170. You're also qualified to receive tax deductible bequests, legacies, devises, transfers, or gifts under IRC Sections 2055, 2106, and 2522.

In the heading of this letter, we indicated whether you must file an annual information return. If you're required to file a return, you must file one of the following by the 15th day of the 5th month after the end of your annual accounting period:

- Form 990, Return of Organization Exempt From Income Tax
- Form 990EZ, Short Form Return of Organization Exempt From Income Tax
- Form 990-N, Electronic Notice (e-Postcard) for Tax-Exempt Organizations Not Required to File Form 990 or Form 990-EZ
- Form 990-PF, Return of Private Foundation or Section 4947(a)(1)
  Trust Treated as Private Foundation

According to IRC Section 6033(j), if you don't file a required annual information return or notice for 3 consecutive years, we'll revoke your tax-exempt status on the due date of the 3rd required return or notice.

You can get IRS forms or publications you need from our website at www.irs.gov/forms-pubs or by calling 800-TAX-FORM (800-829-3676).

If you have questions, call 877-829-5500 between 8 a.m. and 5 p.m.,

4077952422 June 12, 2018 LTR 4168C 0 64-0823550 000000 00 00033919

CARES CENTER INC
DBA CANOPY CHILDRENS SOLUTIONS
PO BOX 1078
JACKSON MS 39215

local time, Monday through Friday (Alaska and Hawaii follow Pacific time).

Thank you for your cooperation.

Sincerely yours,

stephen a martin

Stephen A. Martin Director, ED Rulings & Agreements

## State of Mississippi

Office of the Secretary of State
Dick Molpus, Secretary of State
Jackson, Mississippi

MISSISSIPPI CORPORATION INFORMATION SYSTEM

Corporation Name CARES CENTER, INC.

Corp ID: 0570728

Filed: 09/09/1992 AT 8:00 A. M.

Dick Molpus Secretary of State

Filing Fee Receipt: \$50.00

Secretary of State P.O. Box 136 Jackson, Ms 37205 (601) 359-1333



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### ARTICLES OF INCORPORATION

OF

### CARES Center, Inc.

a not for-profit corporation

The undersigned person, pursuant to Section 79-1 15 Charles Mississippi Code of 1972, hereby executes the following coment and sets forth:

- The name of the corporation is CARES Center, Inc.
- The domicile address of the corporation is 1801 North West Street Jackson, Mississippi 39205
- The period of its duration is perpetual.
- 4. The street address of its initial registered office\is

2829 Lakeland Drive, Suite 1400 Jackson, Mississippi 39208

and the name of its initial registered agent at such address is

Glover A. Russell, Jr.

5. The name and complete address of the incorporator is as follows:

> Glover A. Russell, Jr. 2829 Lakeland Drive, Suite 1400 Jackson, Mississippi 39208

6. The purpose of this organization is to develop mental health and rehabilitation services and chemical

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dependency programs for children, youth and families. These services may include, but are not limited to, psychiatric residential treatment services, therapeutic care services, day treatment services and outpatient clinical counseling/diagnostic services.

- 7. The purposes for which the Corporation is organized are exclusively charitable, educational, scientific, and religious within the meaning of Section 501(c)(3) of the Internal Revenue Code of 1986 or the corresponding provision of any future U.S. Internal Revenue law.
- 8. Notwithstanding any other provision of these Articles, the Corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code or the corresponding provision of any future U.S. Internal Revenue law.
- 9. No part of the net earnings of the non-profit corporation shall inure to the benefit of, or be distributable to its directors, trustees, officers, or other private persons, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth herein. No substantial part of the activities of the Corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the Corporation

shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of any candidate for public office.

10. In the event of dissolution, the residual assets of the organization shall be distributed as determined by a majority of the Board of Directors to one or more organizations which are exempt as organizations described in Section 501(c)(3) and 170(c)(2) of the Internal Revenue Code of 1986 or corresponding sections of any prior or future Internal Revenue laws, or to the Federal, State or local government or any division thereof for exclusive public purposes.

DATE:	5	•	í	i_	17

Glover A. Russell, Jr., Incorporator

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SUITE 1400 - MIRROR LAKE PLACE -9 2829 LAKELAND DRIVE

F O. BOX SEBOY OF ... ACKSON, MIBBIRSHIPP I 3566RETARY OF ... (BOII 938-3895 JACKSON, J. ...

September 8, 1992

SEVENTH FLOOR - ONE MERISSIPPI PLAZA
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PACRIMIC PROPERTY
SUITE EDIT A HOUSTON CENTER
HOUSTON, TEXAS TROO
HOUSE HOUSTON CENTER
1331 488-1300
FACRIMIC TIJI OSCHOOS

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Secretary of State State of Mississippi Corporations Division Magnolia Federal Bank Building 202 North Congress Street Jackson, MS 39201

RE: CARES Center, Inc.

Dear Sir:

PERACO CENTRA - 400 BOYDRAY STEET
MOW GRILLAND, LOUGH AND IDDA 5 STREET
PACEMILES 1904) 268-9130 AND IDDA 5 STREET
PACEMILES 1904) 268-9130 AND IDDA 5 STREET
CABLE MOVED CHARLES
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SUPE TOIL CITY MATIDINAL MANA GUILDING

DO BOS ANS

BATON MONOT, LOUISIANA TORRINAL

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Glover ... Russell, Jr. Partner Resident in Mississippi

Please find enclosed the original and one conformed copy of your office. I have enclosed our check in the amount of \$50.00 in payment of the filing fec. I have also enclosed a self addressed stamped envelope for your use in returning a copy of the filed Articles to me.

Thank you for your cooperation in this matter.

Sincorely,

PHELPS DUNBAR

Jan Romer Glover A. Russell, Jr.

GAR, jr:mhv

enclosures