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Form 990-PF

Department of the Treasury
Internal Revenue Service

Return of Private Foundation

or Section 4947(a)(1) Trust Treated as Private Foundation

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Information about Form 990-PF and its instructions is at www.irs.gov/form990pf.

OMB No 1545-0052

2014

Open to Public Inspection

For calendar year 2014, or tax year beginning 01-01-2014 , and ending 12-31-2014

Name of foundation Walter and Lucille Rubin Foundation Inc		A Employer identification number 26-0369836	
Number and street (or P O box number if mail is not delivered to street address) 2101 NW Corporate Blvd Suite 317		B Telephone number (see instructions) (561) 999-5990	
City or town, state or province, country, and ZIP or foreign postal code Boca Raton, FL 33431		C If exemption application is pending, check here <input type="checkbox"/>	
G Check all that apply <div><input type="checkbox"/> Initial return <input type="checkbox"/> Final return <input type="checkbox"/> Address change</div> <div><input type="checkbox"/> Initial return of a former public charity <input type="checkbox"/> Amended return <input type="checkbox"/> Name change</div>		D 1. Foreign organizations, check here <input type="checkbox"/> 2. Foreign organizations meeting the 85% test, check here and attach computation <input type="checkbox"/>	
H Check type of organization <input checked="" type="checkbox"/> Section 501(c)(3) exempt private foundation <input type="checkbox"/> Section 4947(a)(1) nonexempt charitable trust <input type="checkbox"/> Other taxable private foundation		E If private foundation status was terminated under section 507(b)(1)(A), check here <input type="checkbox"/>	
I Fair market value of all assets at end of year (from Part II, col. (c), line 16) \$ 14,215,815		F If the foundation is in a 60-month termination under section 507(b)(1)(B), check here <input type="checkbox"/>	
J Accounting method <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Accrual <input type="checkbox"/> Other (specify) _____ (Part I, column (d) must be on cash basis.)			

Part I Analysis of Revenue and Expenses (The total of amounts in columns (b), (c), and (d) may not necessarily equal the amounts in column (a) (see instructions))		(a) Revenue and expenses per books	(b) Net investment income	(c) Adjusted net income	(d) Disbursements for charitable purposes (cash basis only)
Revenue	1 Contributions, gifts, grants, etc , received (attach schedule)				
	2 Check <input checked="" type="checkbox"/> if the foundation is not required to attach Sch B				
	3 Interest on savings and temporary cash investments	555	555		
	4 Dividends and interest from securities.	15,770	15,770		
	5a Gross rents	270,482	270,482		
	b Net rental income or (loss) 37,036				
	6a Net gain or (loss) from sale of assets not on line 10	34,745			
	b Gross sales price for all assets on line 6a 1,311,900				
	7 Capital gain net income (from Part IV, line 2) . . .		34,745		
	8 Net short-term capital gain				
	9 Income modifications				
	10a Gross sales less returns and allowances				
Operating and Administrative Expenses	b Less Cost of goods sold				
	c Gross profit or (loss) (attach schedule)				
	11 Other income (attach schedule)				
	12 Total. Add lines 1 through 11	321,552	321,552		
	13 Compensation of officers, directors, trustees, etc	0	0		0
	14 Other employee salaries and wages				
	15 Pension plans, employee benefits				
	16a Legal fees (attach schedule)				
	b Accounting fees (attach schedule)	9,850	9,850		0
	c Other professional fees (attach schedule)	2,480	2,480		0
	17 Interest	32,898	32,898		0
	18 Taxes (attach schedule) (see instructions)	52,304	48,804		0
	19 Depreciation (attach schedule) and depletion	49,364	49,364		
	20 Occupancy				
	21 Travel, conferences, and meetings				
	22 Printing and publications				
	23 Other expenses (attach schedule)	114,917	114,917		0
	24 Total operating and administrative expenses.				
	Add lines 13 through 23	261,813	258,313		0
	25 Contributions, gifts, grants paid	664,550			664,550
	26 Total expenses and disbursements. Add lines 24 and 25	926,363	258,313		664,550
	27 Subtract line 26 from line 12				
	a Excess of revenue over expenses and disbursements	-604,811			
	b Net investment income (if negative, enter -0-)		63,239		
	c Adjusted net income (if negative, enter -0-)				

Part II Balance Sheets		Attached schedules and amounts in the description column should be for end-of-year amounts only (See instructions)	Beginning of year	End of year	
			(a) Book Value	(b) Book Value	(c) Fair Market Value
Assets	1	Cash—non-interest-bearing			
	2	Savings and temporary cash investments	4,577,430	1,520,174	1,520,174
	3	Accounts receivable ▶ _____ Less allowance for doubtful accounts ▶ _____			
	4	Pledges receivable ▶ _____ Less allowance for doubtful accounts ▶ _____			
	5	Grants receivable			
	6	Receivables due from officers, directors, trustees, and other disqualified persons (attach schedule) (see instructions)			
	7	Other notes and loans receivable (attach schedule) ▶ _____ Less allowance for doubtful accounts ▶ _____			
	8	Inventories for sale or use			
	9	Prepaid expenses and deferred charges			
	10a	Investments—U S and state government obligations (attach schedule)			
	b	Investments—corporate stock (attach schedule)	162,126	1,811,957	2,213,018
	c	Investments—corporate bonds (attach schedule).			
	11	Investments—land, buildings, and equipment basis ▶ _____ 2,366,406 Less accumulated depreciation (attach schedule) ▶ _____ 283,505	2,132,265	2,082,901	2,222,308
	12	Investments—mortgage loans			
	13	Investments—other (attach schedule)	3,500,000	6,610,883	8,037,413
	14	Land, buildings, and equipment basis ▶ _____ Less accumulated depreciation (attach schedule) ▶ _____			
Liabilities	15	Other assets (describe ▶ _____)	2,481,807	222,902	222,902
	16	Total assets (to be completed by all filers—see the instructions Also, see page 1, item I)	12,853,628	12,248,817	14,215,815
	17	Accounts payable and accrued expenses			
	18	Grants payable			
	19	Deferred revenue			
	20	Loans from officers, directors, trustees, and other disqualified persons			
	21	Mortgages and other notes payable (attach schedule)			
	22	Other liabilities (describe ▶ _____)			
Net Assets or Fund Balances	23	Total liabilities (add lines 17 through 22)	0	0	
		Foundations that follow SFAS 117, check here ▶ <input type="checkbox"/> and complete lines 24 through 26 and lines 30 and 31.			
	24	Unrestricted			
	25	Temporarily restricted			
	26	Permanently restricted			
		Foundations that do not follow SFAS 117, check here ▶ <input checked="" type="checkbox"/> and complete lines 27 through 31.			
	27	Capital stock, trust principal, or current funds	0	0	
	28	Paid-in or capital surplus, or land, bldg , and equipment fund	0	0	
	29	Retained earnings, accumulated income, endowment, or other funds	12,853,628	12,248,817	
	30	Total net assets or fund balances (see instructions)	12,853,628	12,248,817	
	31	Total liabilities and net assets/fund balances (see instructions) . . .	12,853,628	12,248,817	

Part III Analysis of Changes in Net Assets or Fund Balances		
1	Total net assets or fund balances at beginning of year—Part II, column (a), line 30 (must agree with end-of-year figure reported on prior year’s return)	1 12,853,628
2	Enter amount from Part I, line 27a	2 -604,811
3	Other increases not included in line 2 (itemize) ▶ _____	3 0
4	Add lines 1, 2, and 3	4 12,248,817
5	Decreases not included in line 2 (itemize) ▶ _____	5 0
6	Total net assets or fund balances at end of year (line 4 minus line 5)—Part II, column (b), line 30 .	6 12,248,817

Part IV

Capital Gains and Losses for Tax on Investment Income

(a) List and describe the kind(s) of property sold (e g , real estate, 2-story brick warehouse, or common stock, 200 shs MLC Co)		(b) How acquired P—Purchase D—Donation	(c) Date acquired (mo , day, yr)	(d) Date sold (mo , day, yr)
1 a	UBS (1016)	P	2014-03-31	2014-12-31
b	Merrill Lynch	P	2014-03-31	2014-12-31
c				
d				
e				

(e) Gross sales price	(f) Depreciation allowed (or allowable)	(g) Cost or other basis plus expense of sale	(h) Gain or (loss) (e) plus (f) minus (g)
a 193,958		190,729	3,229
b 1,117,942		1,086,426	31,516
c			
d			
e			

Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69			(I) Gains (Col (h) gain minus col (k), but not less than -0-) or Losses (from col (h))
(i) F M V as of 12/31/69	(j) Adjusted basis as of 12/31/69	(k) Excess of col (i) over col (j), if any	
a			3,229
b			31,516
c			
d			
e			

2	Capital gain net income or (net capital loss)	{ If gain, also enter in Part I, line 7 If (loss), enter -0- in Part I, line 7 }	2	34,745
3	Net short-term capital gain or (loss) as defined in sections 1222(5) and (6) If gain, also enter in Part I, line 8, column (c) (see instructions) If (loss), enter -0- in Part I, line 8	}	3	

Part V

Qualification Under Section 4940(e) for Reduced Tax on Net Investment Income

(For optional use by domestic private foundations subject to the section 4940(a) tax on net investment income)

If section 4940(d)(2) applies, leave this part blank

Was the foundation liable for the section 4942 tax on the distributable amount of any year in the base period?
If "Yes," the foundation does not qualify under section 4940(e) Do not complete this part

☐ Yes ☒ No

1 Enter the appropriate amount in each column for each year, see instructions before making any entries

(a) Base period years Calendar year (or tax year beginning in)	(b) Adjusted qualifying distributions	(c) Net value of noncharitable-use assets	(d) Distribution ratio (col (b) divided by col (c))
2013	692,945	13,984,558	0 049551
2012	671,012	13,616,722	0 049279
2011	616,055	13,392,017	0 046002
2010	562,193	12,635,181	0 044494
2009	22,432	11,506,048	0 001950

2	Total of line 1, column (d).	2	0 191276
3	Average distribution ratio for the 5-year base period—divide the total on line 2 by 5, or by the number of years the foundation has been in existence if less than 5 years	3	0 038255
4	Enter the net value of noncharitable-use assets for 2014 from Part X, line 5.	4	14,053,907
5	Multiply line 4 by line 3.	5	537,632
6	Enter 1% of net investment income (1% of Part I, line 27b).	6	632
7	Add lines 5 and 6.	7	538,264
8	Enter qualifying distributions from Part XII, line 4.	8	664,550

If line 8 is equal to or greater than line 7, check the box in Part VI, line 1b, and complete that part using a 1% tax rate See
the Part VI instructions

Part VIExcise Tax Based on Investment Income (Section 4940(a), 4940(b), 4940(e), or 4948—see page 18 of the instructions)

1a	Exempt operating foundations described in section 4940(d)(2), check here <input type="checkbox"/> and enter "N/A" on line 1		
	Date of ruling or determination letter _____ (attach copy of letter if necessary—see instructions)		
b	Domestic foundations that meet the section 4940(e) requirements in Part V, check here <input checked="" type="checkbox"/> and enter 1% of Part I, line 27b	1	632
c	All other domestic foundations enter 2% of line 27b. Exempt foreign organizations enter 4% of Part I, line 12, col. (b)		
2	Tax under section 511 (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter -0-)	2	0
3	Add lines 1 and 2.	3	632
4	Subtitle A (income) tax (domestic section 4947(a)(1) trusts and taxable foundations only. Others enter -0-)	4	0
5	Tax based on investment income. Subtract line 4 from line 3. If zero or less, enter -0-	5	632
6	Credits/Payments		
a	2014 estimated tax payments and 2013 overpayment credited to 2014	6a	6,976
b	Exempt foreign organizations—tax withheld at source	6b	
c	Tax paid with application for extension of time to file (Form 8868)	6c	
d	Backup withholding erroneously withheld	6d	
7	Total credits and payments. Add lines 6a through 6d.	7	6,976
8	Enter any penalty for underpayment of estimated tax. Check here <input checked="" type="checkbox"/> if Form 2220 is attached	8	
9	Tax due. If the total of lines 5 and 8 is more than line 7, enter amount owed	9	
10	Overpayment. If line 7 is more than the total of lines 5 and 8, enter the amount overpaid	10	6,344
11	Enter the amount of line 10 to be Credited to 2015 estimated tax 6,344 Refunded	11	0

Part VII-AStatements Regarding Activities

1a	During the tax year, did the foundation attempt to influence any national, state, or local legislation or did it participate or intervene in any political campaign?	1a		No
b	Did it spend more than \$100 during the year (either directly or indirectly) for political purposes (see Instructions for definition)?	1b		No
	<i>If the answer is "Yes" to 1a or 1b, attach a detailed description of the activities and copies of any materials published or distributed by the foundation in connection with the activities.</i>			
c	Did the foundation file Form 1120-POL for this year?	1c		No
d	Enter the amount (if any) of tax on political expenditures (section 4955) imposed during the year: (1) On the foundation \$ <u>0</u> (2) On foundation managers \$ <u>0</u>			
e	Enter the reimbursement (if any) paid by the foundation during the year for political expenditure tax imposed on foundation managers \$ <u>0</u>			
2	Has the foundation engaged in any activities that have not previously been reported to the IRS?	2		No
	<i>If "Yes," attach a detailed description of the activities.</i>			
3	Has the foundation made any changes, not previously reported to the IRS, in its governing instrument, articles of incorporation, or bylaws, or other similar instruments? <i>If "Yes," attach a conformed copy of the changes</i>	3		No
4a	Did the foundation have unrelated business gross income of \$1,000 or more during the year?	4a		No
b	If "Yes," has it filed a tax return on Form 990-T for this year?	4b		
5	Was there a liquidation, termination, dissolution, or substantial contraction during the year?	5		No
	<i>If "Yes," attach the statement required by General Instruction T.</i>			
6	Are the requirements of section 508(e) (relating to sections 4941 through 4945) satisfied either: • By language in the governing instrument, or • By state legislation that effectively amends the governing instrument so that no mandatory directions that conflict with the state law remain in the governing instrument?	6		No
7	Did the foundation have at least \$5,000 in assets at any time during the year? <i>If "Yes," complete Part II, col. (c), and Part XV.</i>	7	Yes	
8a	Enter the states to which the foundation reports or with which it is registered (see instructions) FL _____			
b	If the answer is "Yes" to line 7, has the foundation furnished a copy of Form 990-PF to the Attorney General (or designate) of each state as required by General Instruction G? <i>If "No," attach explanation.</i>	8b	Yes	
9	Is the foundation claiming status as a private operating foundation within the meaning of section 4942(j)(3) or 4942(j)(5) for calendar year 2014 or the taxable year beginning in 2014 (see instructions for Part XIV)? <i>If "Yes," complete Part XIV</i>	9		No
10	Did any persons become substantial contributors during the tax year? <i>If "Yes," attach a schedule listing their names and addresses.</i>	10		No

Part VII-A

Statements Regarding Activities *(continued)*

11	At any time during the year, did the foundation, directly or indirectly, own a controlled entity within the meaning of section 512(b)(13)? If "Yes," attach schedule (see instructions).	11		No
12	Did the foundation make a distribution to a donor advised fund over which the foundation or a disqualified person had advisory privileges? If "Yes," attach statement (see instructions)	12		No
13	Did the foundation comply with the public inspection requirements for its annual returns and exemption application?	13	Yes	
Website address N/A				
14	The books are in care of Walter and Lucille Rubin Telephone no (561) 999-5990 Located at 2101 NW Corporate Blvd Suite 317 Boca Raton FL ZIP+4 33431			
15	Section 4947(a)(1) nonexempt charitable trusts filing Form 990-PF in lieu of Form 1041 —Check here and enter the amount of tax-exempt interest received or accrued during the year.	15		
16	At any time during calendar year 2014, did the foundation have an interest in or a signature or other authority over a bank, securities, or other financial account in a foreign country?	16	Yes	No
See instructions for exceptions and filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR) If "Yes", enter the name of the foreign country				

Part VII-B

Statements Regarding Activities for Which Form 4720 May Be Required

File Form 4720 if any item is checked in the "Yes" column, unless an exception applies.			Yes	No
1a	During the year did the foundation (either directly or indirectly)			
	(1) Engage in the sale or exchange, or leasing of property with a disqualified person? Yes No			
	(2) Borrow money from, lend money to, or otherwise extend credit to (or accept it from) a disqualified person? Yes No			
	(3) Furnish goods, services, or facilities to (or accept them from) a disqualified person? Yes No			
	(4) Pay compensation to, or pay or reimburse the expenses of, a disqualified person? Yes No			
	(5) Transfer any income or assets to a disqualified person (or make any of either available for the benefit or use of a disqualified person)? Yes No			
	(6) Agree to pay money or property to a government official? (Exception. Check "No" if the foundation agreed to make a grant to or to employ the official for a period after termination of government service, if terminating within 90 days). Yes No			
b	If any answer is "Yes" to 1a(1)–(6), did any of the acts fail to qualify under the exceptions described in Regulations section 53.4941(d)-3 or in a current notice regarding disaster assistance (see instructions)? Organizations relying on a current notice regarding disaster assistance check here.	1b		
c	Did the foundation engage in a prior year in any of the acts described in 1a, other than excepted acts, that were not corrected before the first day of the tax year beginning in 2014?	1c		No
2	Taxes on failure to distribute income (section 4942) (does not apply for years the foundation was a private operating foundation defined in section 4942(j)(3) or 4942(j)(5))			
a	At the end of tax year 2014, did the foundation have any undistributed income (lines 6d and 6e, Part XIII) for tax year(s) beginning before 2014? If "Yes," list the years 20 , 20 , 20 , 20 Yes No			
b	Are there any years listed in 2a for which the foundation is not applying the provisions of section 4942(a)(2) (relating to incorrect valuation of assets) to the year's undistributed income? (If applying section 4942(a)(2) to all years listed, answer "No" and attach statement—see instructions).	2b		
c	If the provisions of section 4942(a)(2) are being applied to any of the years listed in 2a, list the years here 20 , 20 , 20 , 20			
3a	Did the foundation hold more than a 2% direct or indirect interest in any business enterprise at any time during the year? Yes No			
b	If "Yes," did it have excess business holdings in 2014 as a result of (1) any purchase by the foundation or disqualified persons after May 26, 1969, (2) the lapse of the 5-year period (or longer period approved by the Commissioner under section 4943(c)(7)) to dispose of holdings acquired by gift or bequest, or (3) the lapse of the 10-, 15-, or 20-year first phase holding period? (Use Schedule C, Form 4720, to determine if the foundation had excess business holdings in 2014.).	3b		
4a	Did the foundation invest during the year any amount in a manner that would jeopardize its charitable purposes?	4a		No
b	Did the foundation make any investment in a prior year (but after December 31, 1969) that could jeopardize its charitable purpose that had not been removed from jeopardy before the first day of the tax year beginning in 2014?	4b		No

Part VII-B

Statements Regarding Activities for Which Form 4720 May Be Required (continued)

5a	During the year did the foundation pay or incur any amount to			
	(1) Carry on propaganda, or otherwise attempt to influence legislation (section 4945(e))?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	(2) Influence the outcome of any specific public election (see section 4955), or to carry on, directly or indirectly, any voter registration drive?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	(3) Provide a grant to an individual for travel, study, or other similar purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	(4) Provide a grant to an organization other than a charitable, etc , organization described in section 4945(d)(4)(A)? (see instructions).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	(5) Provide for any purpose other than religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
b	If any answer is "Yes" to 5a(1)–(5), did any of the transactions fail to qualify under the exceptions described in Regulations section 53.4945 or in a current notice regarding disaster assistance (see instructions)?	5b		
	Organizations relying on a current notice regarding disaster assistance check here.	<input type="checkbox"/>		
c	If the answer is "Yes" to question 5a(4), does the foundation claim exemption from the tax because it maintained expenditure responsibility for the grant?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
	If "Yes," attach the statement required by Regulations section 53.4945–5(d).			
6a	Did the foundation, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
b	Did the foundation, during the year, pay premiums, directly or indirectly, on a personal benefit contract?	6b		No
	If "Yes" to 6b, file Form 8870.			
7a	At any time during the tax year, was the foundation a party to a prohibited tax shelter transaction?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
b	If yes, did the foundation receive any proceeds or have any net income attributable to the transaction?	7b		

Part VIII

Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors

1 List all officers, directors, trustees, foundation managers and their compensation (see instructions).				
(a) Name and address	(b) Title, and average hours per week devoted to position	(c) Compensation (If not paid, enter -0-)	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
Walter Rubin	Director	0	0	0
2101 NW Corporate Blvd Suite 317 Boca Raton, FL 33431	2 00			
Lucille Rubin	Director	0	0	0
2101 NW Corporate Blvd Suite 317 Boca Raton, FL 33431	2 00			
2 Compensation of five highest-paid employees (other than those included on line 1—see instructions). If none, enter "NONE."				
(a) Name and address of each employee paid more than \$50,000	(b) Title, and average hours per week devoted to position	(c) Compensation	(d) Contributions to employee benefit plans and deferred compensation	(e) Expense account, other allowances
NONE				
Total number of other employees paid over \$50,000.				0

Part VIII

Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors (continued)

3 Five highest-paid independent contractors for professional services (see instructions). If none, enter "NONE".		
(a) Name and address of each person paid more than \$50,000	(b) Type of service	(c) Compensation
NONE		
Total number of others receiving over \$50,000 for professional services.		0

Part IX-A

Summary of Direct Charitable Activities

List the foundation's four largest direct charitable activities during the tax year. Include relevant statistical information such as the number of organizations and other beneficiaries served, conferences convened, research papers produced, etc	Expenses
1	
2	
3	
4	

Part IX-B

Summary of Program-Related Investments (see instructions)

Describe the two largest program-related investments made by the foundation during the tax year on lines 1 and 2	Amount
1	
2	
All other program-related investments. See instructions.	
3	
Total. Add lines 1 through 3.	0

Part X

Minimum Investment Return (All domestic foundations must complete this part. Foreign foundations, see instructions.)

1	Fair market value of assets not used (or held for use) directly in carrying out charitable, etc , purposes		
a	Average monthly fair market value of securities.	1a	1,613,439
b	Average of monthly cash balances.	1b	2,759,340
c	Fair market value of all other assets (see instructions).	1c	9,895,147
d	Total (add lines 1a, b, and c).	1d	14,267,926
e	Reduction claimed for blockage or other factors reported on lines 1a and 1c (attach detailed explanation).	1e	0
2	Acquisition indebtedness applicable to line 1 assets.	2	0
3	Subtract line 2 from line 1d.	3	14,267,926
4	Cash deemed held for charitable activities Enter 1 1/2% of line 3 (for greater amount, see instructions).	4	214,019
5	Net value of noncharitable-use assets. Subtract line 4 from line 3 Enter here and on Part V, line 4	5	14,053,907
6	Minimum investment return. Enter 5% of line 5.	6	702,695

Part XI

Distributable Amount (see instructions) (Section 4942(j)(3) and (j)(5) private operating foundations and certain foreign organizations check here ☐ and do not complete this part.)

1	Minimum investment return from Part X, line 6.	1	702,695
2a	Tax on investment income for 2014 from Part VI, line 5.	2a	632
b	Income tax for 2014 (This does not include the tax from Part VI).	2b	
c	Add lines 2a and 2b.	2c	632
3	Distributable amount before adjustments Subtract line 2c from line 1.	3	702,063
4	Recoveries of amounts treated as qualifying distributions.	4	0
5	Add lines 3 and 4.	5	702,063
6	Deduction from distributable amount (see instructions).	6	0
7	Distributable amount as adjusted Subtract line 6 from line 5 Enter here and on Part XIII, line 1.	7	702,063

Part XII

Qualifying Distributions (see instructions)

1	Amounts paid (including administrative expenses) to accomplish charitable, etc , purposes		
a	Expenses, contributions, gifts, etc —total from Part I, column (d), line 26.	1a	664,550
b	Program-related investments—total from Part IX-B.	1b	0
2	Amounts paid to acquire assets used (or held for use) directly in carrying out charitable, etc , purposes.	2	
3	Amounts set aside for specific charitable projects that satisfy the		
a	Suitability test (prior IRS approval required).	3a	
b	Cash distribution test (attach the required schedule).	3b	
4	Qualifying distributions. Add lines 1a through 3b Enter here and on Part V, line 8, and Part XIII, line 4	4	664,550
5	Foundations that qualify under section 4940(e) for the reduced rate of tax on net investment income Enter 1% of Part I, line 27b (see instructions).	5	632
6	Adjusted qualifying distributions. Subtract line 5 from line 4.	6	663,918

Note: The amount on line 6 will be used in Part V, column (b), in subsequent years when calculating whether the foundation qualifies for the section 4940(e) reduction of tax in those years

Part XIII

Undistributed Income (see instructions)

	(a) Corpus	(b) Years prior to 2013	(c) 2013	(d) 2014
1 Distributable amount for 2014 from Part XI, line 7				702,063
2 Undistributed income, if any, as of the end of 2014				
a Enter amount for 2013 only.			663,651	
b Total for prior years 20__, 20__, 20__		0		
3 Excess distributions carryover, if any, to 2014				
a From 2009.				
b From 2010.				
c From 2011.				
d From 2012.				
e From 2013.				
f Total of lines 3a through e.	0			
4 Qualifying distributions for 2014 from Part XII, line 4 ▶ \$ 664,550				
a Applied to 2013, but not more than line 2a			663,651	
b Applied to undistributed income of prior years (Election required—see instructions).		0		
c Treated as distributions out of corpus (Election required—see instructions).	0			
d Applied to 2014 distributable amount.				899
e Remaining amount distributed out of corpus	0			
5 Excess distributions carryover applied to 2014 (If an amount appears in column (d), the same amount must be shown in column (a).)	0			0
6 Enter the net total of each column as indicated below:				
a Corpus Add lines 3f, 4c, and 4e Subtract line 5	0			
b Prior years' undistributed income Subtract line 4b from line 2b.		0		
c Enter the amount of prior years' undistributed income for which a notice of deficiency has been issued, or on which the section 4942(a) tax has been previously assessed.		0		
d Subtract line 6c from line 6b Taxable amount—see instructions		0		
e Undistributed income for 2013 Subtract line 4a from line 2a Taxable amount—see instructions			0	
f Undistributed income for 2014 Subtract lines 4d and 5 from line 1 This amount must be distributed in 2015				701,164
7 Amounts treated as distributions out of corpus to satisfy requirements imposed by section 170(b)(1)(F) or 4942(g)(3) (Election may be required - see instructions).	0			
8 Excess distributions carryover from 2009 not applied on line 5 or line 7 (see instructions). . .	0			
9 Excess distributions carryover to 2015. Subtract lines 7 and 8 from line 6a	0			
10 Analysis of line 9				
a Excess from 2010. . . .				
b Excess from 2011. . . .				
c Excess from 2012. . . .				
d Excess from 2013. . . .				
e Excess from 2014. . . .				

Part XIV

4942(j)(3) or 4942(j)(5)

3

Part XV

1

2

Time	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
Time	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100

Part XV

Supplementary Information (continued)

3 Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Name and address (home or business)				
a Paid during the year See Additional Data Table				
Total			3a	664,550
b Approved for future payment				
Total			3b	0

Enter gross amounts unless otherwise indicated

Part XVI-B Relationship of Activities to the Accomplishment of Exempt Purposes

Form **990-PF** (2014)

1 Did the organization directly or indirectly engage in any of the following with any other organization described in section 501(c) of the Code (other than section 501(c)(3) organizations) or in section 527, relating to political organizations?			Yes	No
a Transfers from the reporting foundation to a noncharitable exempt organization of				
(1) Cash.		1a(1)		No
(2) Other assets.		1a(2)		No
b Other transactions				
(1) Sales of assets to a noncharitable exempt organization.		1b(1)		No
(2) Purchases of assets from a noncharitable exempt organization.		1b(2)		No
(3) Rental of facilities, equipment, or other assets.		1b(3)		No
(4) Reimbursement arrangements.		1b(4)		No
(5) Loans or loan guarantees.		1b(5)		No
(6) Performance of services or membership or fundraising solicitations.		1b(6)		No
c Sharing of facilities, equipment, mailing lists, other assets, or paid employees.		1c		No
d If the answer to any of the above is "Yes," complete the following schedule. Column (b) should always show the fair market value of the goods, other assets, or services given by the reporting foundation. If the foundation received less than fair market value in any transaction or sharing arrangement, show in column (d) the value of the goods, other assets, or services received				

[illegible]

2a Is the foundation directly or indirectly affiliated with, or related to, one or more tax-exempt organizations described in section 501(c) of the Code (other than section 501(c)(3)) or in section 527? ☐ Yes ☒ No


b If "Yes," complete the following schedule		
(a) Name of organization	(b) Type of organization	(c) Description of relationship

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.


Sign Here	*****	2015-07-09	*****	<div style="border: 1px solid black; padding: 5px;"> May the IRS discuss this return with the preparer shown below (see instr)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div>
	_____ Signature of officer or trustee	_____ Date	_____ Title	

Paid Preparer Use Only	Print/Type preparer's name Steven R Tubbs	Preparer's Signature	Date	Check if self-employed <input checked="" type="checkbox"/>	PTIN P00964386
	Firm's name <input checked="" type="checkbox"/> TUBBS & BARTNICK PL			Firm's EIN <input checked="" type="checkbox"/> 65-0385759	
	Firm's address <input checked="" type="checkbox"/> 2101 NW CORPORATE BLVD SUITE 317 BOCA RATON, FL 33431			Phone no (561) 361-0330	

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment


Recipient	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Name and address (home or business)				
a <i>Paid during the year</i>				
American Society for Yad Vachem Inc 500 Fifth Avenue 42nd Floor New York, NY 10110	None		To Further the Charitable Purpose of the Donee	1,000
Jafco 4200 University Drive Sunrise, FL 33351	None		To Further the Charitable Purpose of the Donee	1,000
Ruth Rales Jewish Family Service 21300 Ruth and Baron Coleman Blvd Boca Raton, FL 33428	None		To Further the Charitable Purpose of the Donee	5,000
United States Holocaust Museum 100 Raoul Wallenberg Place SW Washington, DC 20024	None		To Further the Charitable Purpose of the Donee	1,000
Center for Jewish History 15 W 16th St New York, NY 10011	None		To Further the Charitable Purpose of the Donee	250
Jewish Federation of SPB 9901 Donna Klein Blvd Boca Raton, FL 33428	None		To Further the Charitable Purpose of the Donee	25,000
John Hopkins Medicine 733 N Broadway Suite 100 Baltimore, MD 21205	None		To Further the Charitable Purpose of the Donee	25,000
BRRH Foundation 745 Meadows Road Boca Raton, FL 33486	None		To Further the Charitable Purpose of the Donee	50,000
Massachusetts General Hospital 55 Fruit Street Blufinch 351 Boston, MA 02114	None		To Further the Charitable Purpose of the Donee	25,000
GI Research Institute c/o Larry Bishins 4548 N Federal Hwy Ft Lauderdale, FL 33308	None		To Further the Charitable Purpose of the Donee	25,000
Hospice by the Sea 1531 West Palmetto Park Rd Boca Raton, FL 33486	None		To Further the Charitable Purpose of the Donee	1,000
Susan Komen Cure 5005 LBJ Freeway Suite 250 Dallas, TX 75244	None		To Further the Charitable Purpose of the Donee	500
Sylveter Comprehensive Cancer Center PO Box 016960 M867 Miami, FL 33101	None		To Further the Charitable Purpose of the Donee	5,000
UM Dept of Neurology Epilepsy Research 1120 NW 14th Street Suite 1382 Miami, FL 33149	None		To Further the Charitable Purpose of the Donee	80,000
WXEL PO Box 6607 West Palm Beach, FL 33405	None		To Further the Charitable Purpose of the Donee	1,000
Total  3a				664,550

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Name and address (home or business)				
a <i>Paid during the year</i>				
Kravis Center 701 Okeechobee BLvd West Palm Beach,FL 33401	None		To Further the Charitable Purpose of the Donee	1,000
Broward Center for the Performing Arts 201 SW Fifth Ave Ft Lauderdale, FL 33312	None		To Further the Charitable Purpose of the Donee	1,000
ST Judes Childrens Research Hospital 501 St Jude Place Memphis,TN 38105	None		To Further the Charitable Purpose of the Donee	1,000
Friends of the Uffizi Inc 205 Worth Ave 201 Palm Beach,FL 33480	None		To Further the Charitable Purpose of the Donee	1,000
Palazzo Strozzi Piazza Strozzi Florence IT	None		To Further the Charitable Purpose of the Donee	1,000
The Jewish Museum 1109 Fifth Avenue New York,NY 10128	None		To Further the Charitable Purpose of the Donee	2,500
JARC Endowment Fund 30301 Northwestern Highway Suite 100 Farmington Hills,MI 48334	None		To Further the Charitable Purpose of the Donee	25,000
American Friends of Magon David Adom 352 Seventh Ave Ste 400 New York,NY 10001	None		To Further the Charitable Purpose of the Donee	1,000
Smithsonian PO Box 37012 Smithsonian Inst Washington,DC 20013	None		To Further the Charitable Purpose of the Donee	200,000
Woodmere Art Museum 9201 Germantown Ave Philadelphia,PA 19118	None		To Further the Charitable Purpose of the Donee	6,000
Friends of Israel Defence Forces 1430 Broadway Suite 1301 New York,NY 10018	None		To Further the Charitable Purpose of the Donee	1,800
Epilepsy Foundation 8301 Professional Place East Landover,MD 20785	None		To Further the Charitable Purpose of the Donee	25,000
Medical University Of SC Foundation 18 Bee St Charleston,SC 29425	None		To Further the Charitable Purpose of the Donee	100,000
Museum of Ft Lauderdale 1 E Las Olas Blvd Ft Lauderdale, FL 33301	None		To Further the Charitable Purpose of the Donee	1,000
University of Miami Audiology Dept 1120 NW 14th Street Miami,FL 33149	None		To Further the Charitable Purpose of the Donee	20,000
Total  3a				664,550

Form 990PF Part XV Line 3 - Grants and Contributions Paid During the Year or Approved for Future Payment

Recipient	If recipient is an individual, show any relationship to any foundation manager or substantial contributor	Foundation status of recipient	Purpose of grant or contribution	Amount
Name and address (home or business)				
a <i>Paid during the year</i>				
Bascom Palmer Eye Institute 1120 NW 14th Street Miami, FL 33149	None		To Further the Charitable Purpose of the Donee	5,000
The Cleveland Clinic 2950 Cleveland Clinic Blvd Weston, FL 33331	None		To Further the Charitable Purpose of the Donee	25,000
Jewish Education Center of S Florida 3600 NW 2nd Ct Boca Raton, FL 33431	None		To Further the Charitable Purpose of the Donee	1,000
Congregation B'nai Israel 2200Yamato Rd Boca Raton, FL 33431	None		To Further the Charitable Purpose of the Donee	500
Total			3a	664,550

Form **3115**
(Rev. December 2009) 
Department of the Treasury
Internal Revenue Service

Application for Change in Accounting Method

OMB No. 1545-0152

Name of filer (name of parent corporation if a consolidated group) (see instructions) Walter and Lucille Rubin Foundation Inc	Identification number (see instructions) 26-0369836	
	Principal business activity code number (see instructions) 531120	
Number, street, and room or suite no. If a P.O. box, see the instructions 2101 NW Corporate Blvd Suite 317	Tax year of change begins (MM/DD/YYYY) 01-01-2014	
	Tax year of change ends (MM/DD/YYYY) 12-31-2014	
City or town, state, and ZIP code Boca Raton, FL 33431	Name of contact person (see instructions) Steven R Tubbs	
Name of applicant(s) (if different than filer) and identification number(s) (see instructions) Walter and Lucille Rubin Foundation Inc I.D. No. 26-0369836		Contact person's telephone number (561) 361-0330

If the applicant is a member of a consolidated group, check this box ☐

If **Form 2848**, Power of Attorney and Declaration of Representative, is attached (see instructions for when Form 2848 is required), check this box ☐

Check the box to indicate the applicant. <input type="checkbox"/> Individual <input type="checkbox"/> Corporation <input type="checkbox"/> Controlled foreign corporation (Sec. 957) <input type="checkbox"/> 10/50 corporation (Sec. 904(d)(2)(E)) <input type="checkbox"/> Qualified personal service corporation (Sec. 448(d)(2)) <input checked="" type="checkbox"/> Exempt organization. Enter Code section <input type="checkbox"/> 501(c)(3)	Check the appropriate box to indicate the type of accounting method change being requested. (see instructions) <input type="checkbox"/> Depreciation or Amortization <input type="checkbox"/> Financial Products and/or Financial Activities of Financial Institutions <input checked="" type="checkbox"/> Other (specify) <input type="checkbox"/> See Codes in Part I
<input type="checkbox"/> Cooperative (Sec. 1381) <input type="checkbox"/> Partnership <input type="checkbox"/> S corporation <input type="checkbox"/> Insurance co. (Sec. 816(a)) <input type="checkbox"/> Insurance co. (Sec. 831) <input type="checkbox"/> Other (specify) <input type="checkbox"/>	

Caution: *To be eligible for approval of the requested change in method of accounting, the taxpayer must provide all information that is relevant to the taxpayer or to the taxpayer's requested change in method of accounting. This includes all information requested on this Form 3115 (including its instructions), as well as any other information that is not specifically requested.*

The taxpayer must attach all applicable supplemental statements requested throughout this form.

Part I Information For Automatic Change Request	Yes	No
1 Enter the applicable designated automatic accounting method change number for the requested automatic change. Enter only one designated automatic accounting method change number, except as provided for in guidance published by the IRS. If the requested change has no designated automatic accounting method change number, check "Other," and provide both a description of the change and citation of the IRS guidance providing the automatic change. See instructions. <input type="checkbox"/> (a) Change No. <input type="checkbox"/> (b) Other <input checked="" type="checkbox"/> Description <input type="checkbox"/> 184, 186, 187, 192		
2 Do any of the scope limitations described in section 4.02 of Rev. Proc. 2008-52 cause automatic consent to be unavailable for the applicant's requested change? If "Yes," attach an explanation.		X
Note: <i>Complete Part II below and then Part IV, and also Schedules A through E of this form (if applicable).</i>		
Part II Information For All Requests	Yes	No
3 Did or will the applicant cease to engage in the trade or business to which the requested change relates, or terminate its existence, in the tax year of change (see instructions)? If "Yes," the applicant is not eligible to make the change under automatic change request procedures.		X
4a Does the applicant (or any present or former consolidated group in which the applicant was a member during the applicable tax year(s)) have any Federal income tax return(s) under examination (see instructions)? If "No," go to line 5.		X
b Is the method of accounting the applicant is requesting to change an issue (with respect to either the applicant or any present or former consolidated group in which the applicant was a member during the applicable tax year(s)) either (i) under consideration or (ii) placed in suspense (see instructions)?		

Signature (see instructions)

Under penalties of perjury, I declare that I have examined this application, including accompanying schedules and statements, and to the best of my knowledge and belief, the application contains all the relevant facts relating to the application, and it is true, correct, and complete. Declaration of preparer (other than applicant) is based on all information of which preparer has any knowledge.

Filer
***** 2015-07-09

Preparer (other than filer/applicant)
P00964386

Signature and date
Walter and Lucille Rubin Foundation Inc

Signature of individual preparing the application and date
Steven R Tubbs

Name and title (print or type)

Name of individual preparing the application (print or type)
TUBBS & BARTNICK PL

Name of firm preparing the application


For Privacy Act and Paperwork Reduction Act Notice, see the instructions.

Cat. No. 19280E

Form **3115** (Rev. 12-2009)

Part II	Information For All Requests (continued)	Yes	No
4c	Is the method of accounting the applicant is requesting to change an issue pending (with respect to either the applicant or any present or former consolidated group in which the applicant was a member during the applicable tax year(s)) for any tax year under examination (see instructions)?		
d	Is the request to change the method of accounting being filed under the procedures requiring that the operating division director consent to the filing of the request (see instructions)? If "Yes," attach the consent statement from the director		
e	Is the request to change the method of accounting being filed under the 90-day or 120-day window period? . If "Yes," check the box for the applicable window period and attach the required statement (see instructions) <input type="checkbox"/> 90 day <input type="checkbox"/> 120 day Date examination ended ►_____		
f	If you answered "Yes" to line 4a, enter the name and telephone number of the examining agent and the tax year(s) under examination Name ►_____ Telephone number ►_____ Tax year(s) ►_____		
g	Has a copy of this Form 3115 been provided to the examining agent identified on line 4f?		
5a	Does the applicant (or any present or former consolidated group in which the applicant was a member during the applicable tax year(s)) have any Federal income tax return(s) before Appeals and/or a Federal court? . If "Yes," enter the name of the (check the box) <input type="checkbox"/> Appeals officer and/or <input type="checkbox"/> counsel for the government, telephone number, and the tax year(s) before Appeals and/or a Federal court Name ►_____ Telephone number ►_____ Tax year(s) ►_____		X
b	Has a copy of this Form 3115 been provided to the Appeals officer and/or counsel for the government identified on line 5a?		
c	Is the method of accounting the applicant is requesting to change an issue under consideration by Appeals and/or a Federal court (for either the applicant or any present or former consolidated group in which the applicant was a member for the tax year(s) the applicant was a member) (see instructions)? If "Yes," attach an explanation		X
6	If the applicant answered "Yes" to line 4a and/or 5a with respect to any present or former consolidated group, attach a statement that provides each parent corporation's (a) name, (b) identification number, (c) address, and (d) tax year(s) during which the applicant was a member that is under examination, before an Appeals office, and/or before a Federal court		
7	If, for federal income tax purposes, the applicant is either an entity (including a limited liability company) treated as a partnership or an S corporation, is it requesting a change from a method of accounting that is an issue under consideration in an examination, before Appeals, or before a Federal court, with respect to a Federal income tax return of a partner, member, or shareholder of that entity? If "Yes," the applicant is not eligible to make the change		X
8a	Does the applicable revenue procedure (advance consent or automatic consent) state that the applicant does not receive audit protection for the requested change (see instructions)?		X
b	If "Yes," attach an explanation		
9a	Has the applicant, its predecessor, or a related party requested or made (under either an automatic change procedure or a procedure requiring advance consent) a change in method of accounting within the past 5 years (including the year of the requested change)?		X
b	If "Yes," for each trade or business, attach a description of each requested change in method of accounting (including the tax year of change) and state whether the applicant received consent		
c	If any application was withdrawn, not perfected, or denied, or if a Consent Agreement granting a change was not signed and returned to the IRS, or the change was not made or not made in the requested year of change, attach an explanation		
10a	Does the applicant, its predecessor, or a related party currently have pending any request (including any concurrently filed request) for a private letter ruling, change in method of accounting, or technical advice? . . .		X
b	If "Yes," for each request attach a statement providing the name(s) of the taxpayer, identification number(s), the type of request (private letter ruling, change in method of accounting, or technical advice), and the specific issue(s) in the request(s)		
11	Is the applicant requesting to change its overall method of accounting? If "Yes," check the appropriate boxes below to indicate the applicant's present and proposed methods of accounting Also, complete Schedule A on page 4 of this form Present method: <input type="checkbox"/> Cash <input type="checkbox"/> Accrual <input type="checkbox"/> Hybrid (attach description) Proposed method: <input type="checkbox"/> Cash <input type="checkbox"/> Accrual <input type="checkbox"/> Hybrid (attach description)		

Part II Information For All Requests (continued)			Yes	No						
12 If the applicant is either (i) not changing its overall method of accounting, or (ii) is changing its overall method of accounting and also changing to a special method of accounting for one or more items, attach a detailed and complete description for each of the following a The item(s) being changed b The applicant's present method for the item(s) being changed c The applicant's proposed method for the item(s) being changed d The applicant's present overall method of accounting (cash, accrual, or hybrid)										
13 Attach a detailed and complete description of the applicant's trade(s) or business(es), and the principal business activity code for each. If the applicant has more than one trade or business as defined in Regulations section 1.446-1(d), describe whether each trade or business is accounted for separately, the goods and services provided by each trade or business and any other types of activities engaged in that generate gross income, the overall method of accounting for each trade or business, and which trade or business is requesting to change its accounting method as part of this application or a separate application										
14 Will the proposed method of accounting be used for the applicant's books and records and financial statements? For insurance companies, see the instructions If "No," attach an explanation										
15a Has the applicant engaged, or will it engage, in a transaction to which section 381(a) applies (e.g., a reorganization, merger, or liquidation) during the proposed tax year of change determined without regard to any potential closing of the year under section 381(b)(1)?										
b If "Yes," for the items of income and expense that are the subject of this application, attach a statement identifying the methods of accounting used by the parties to the section 381(a) transaction immediately before the date of distribution or transfer and the method(s) that would be required by section 381(c)(4) or (c)(5) absent consent to the change(s) requested in this application										
16 Does the applicant request a conference with the IRS National Office if the IRS proposes an adverse response?			X							
17 If the applicant is changing to either the overall cash method, an overall accrual method, or is changing its method of accounting for any property subject to section 263A, any long-term contract subject to section 460, or inventories subject to section 474, enter the applicant's gross receipts for the 3 tax years preceding the tax year of change <table><tr><td>1st preceding year ended mo yr</td><td>2nd preceding year ended mo yr</td><td>3rd preceding year ended mo yr</td></tr><tr><td>\$</td><td>\$</td><td>\$</td></tr></table>			1st preceding year ended mo yr	2nd preceding year ended mo yr	3rd preceding year ended mo yr	\$	\$	\$		
1st preceding year ended mo yr	2nd preceding year ended mo yr	3rd preceding year ended mo yr								
\$	\$	\$								

Part III Information For Advance Consent Request			Yes	No
18 Is the applicant's requested change described in any revenue procedure, revenue ruling, notice, regulation, or other published guidance as an automatic change request? If "Yes," attach an explanation describing why the applicant is submitting its request under advance consent request procedures				
19 Attach a full explanation of the legal basis supporting the proposed method for the item being changed. Include a detailed and complete description of the facts that explains how the law specifically applies to the applicant's situation and that demonstrates that the applicant is authorized to use the proposed method. Include all authority (statutes, regulations, published rulings, court cases, etc.) supporting the proposed method. Also, include either a discussion of the contrary authorities or a statement that no contrary authority exists.				
20 Attach a copy of all documents related to the proposed change (see instructions)				
21 Attach a statement of the applicant's reasons for the proposed change				
22 If the applicant is a member of a consolidated group for the year of change, do all other members of the consolidated group use the proposed method of accounting for the item being changed? If "No," attach an explanation				
23a Enter the amount of user fee attached to this application (see instructions) ► \$ _____ b If the applicant qualifies for a reduced user fee, attach the required information or certification (see instructions) 				

Part IV Section 481(a) Adjustment			Yes	No
24 Does the applicable revenue procedure, revenue ruling, notice, regulation, or other published guidance require the applicant to implement the requested change in method of accounting on a cut-off basis rather than a section 481(a) adjustment?				
25 Enter the section 481(a) adjustment. Indicate whether the adjustment is an increase (+) or a decrease (-) in income ► \$ _____ 0. Attach a summary of the computation and an explanation of the methodology used to determine the section 481(a) adjustment. If it is based on more than one component, show the computation for each component. If more than one applicant is applying for the method change on the same application, attach a list of the name, identification number, principal business activity code (see instructions), and the amount of the section 481(a) adjustment attributable to each applicant.				

Part IV Section 481(a) Adjustment		Yes	No
26	If the section 481(a) adjustment is an increase to income of less than \$25,000, does the applicant elect to take the entire amount of the adjustment into account in the year of change?		
27	Is any part of the section 481(a) adjustment attributable to transactions between members of an affiliated group, a consolidated group, a controlled group, or other related parties? If "Yes," attach an explanation		

Schedule A-Change in Overall Method of Accounting (If Schedule A applies, Part I below must be completed)

Part I Change in Overall Method (see instructions)

1 Enter the following amounts as of the close of the tax year preceding the year of change. If none, state "None." Also, attach a statement providing a breakdown of the amounts entered on lines 1a through 1g.

	Amount
a Income accrued but not received (such as accounts receivable)	\$ NONE
b Income received or reported before it was earned (such as advanced payments). Attach a description of the income and the legal basis for the proposed method.	NONE
c Expenses accrued but not paid (such as accounts payable)	NONE
d Prepaid expenses previously deducted	NONE
e Supplies on hand previously deducted and/or not previously reported.	NONE
f Inventory on hand previously deducted and/or not previously reported. Complete Schedule D, Part II.	NONE
g Other amounts (specify). Attach a description of the item and the legal basis for its inclusion in the calculation of the section 481(a) adjustment. ▶	NONE
h Net section 481(a) adjustment (Combine lines 1a–1g.) Indicate whether the adjustment is an increase (+) or decrease (–) in income. Also enter the net amount of this section 481(a) adjustment amount on Part IV, line 25.	\$ NONE

2 Is the applicant also requesting the recurring item exception under section 461(h)(3)? ☐ **Yes** ☐ **No**

3 Attach copies of the profit and loss statement (Schedule F (Form 1040) for farmers) and the balance sheet, if applicable, as of the close of the tax year preceding the year of change. Also attach a statement specifying the accounting method used when preparing the balance sheet. If books of account are not kept, attach a copy of the business schedules submitted with the Federal income tax return or other return (e.g., tax-exempt organization returns) for that period. If the amounts in Part I, lines 1a through 1g, do not agree with those shown on both the profit and loss statement and the balance sheet, attach a statement explaining the differences.

Part II Change to the Cash Method For Advance Consent Request (see instructions)

Applicants requesting a change to the cash method must attach the following information:

- 1** A description of inventory items (items whose production, purchase, or sale is an income-producing factor) and materials and supplies used in carrying out the business.
- 2** An explanation as to whether the applicant is required to use the accrual method under any section of the Code or regulations.

Schedule B—Change to the Deferral Method for Advance Payments (see instructions)

- 1** If the applicant is requesting to change to the Deferral Method for advance payments described in section 5 02 of Rev Proc 2004-34, 2004-1 C B 991, attach the following information
 - a** A statement explaining how the advance payments meet the definition in section 4 01 of Rev Proc 2004-34
 - b** If the applicant is filing under the automatic change procedures of Rev Proc 2008-52, the information required by section 8 02(3)(a)-(c) of Rev Proc 2004-34
 - c** If the applicant is filing under the advance consent provisions of Rev Proc 97-27, the information required by section 8 03(2) (a)-(f) of Rev Proc 2004-34
- 2** If the applicant is requesting to change to the deferral method for advance payments described in Regulations section 1 451-5, attach the following
 - a** A statement explaining how the advance payments meet the definition in Regulations section 1 451-5(a)(1)
 - b** A statement explaining what portions of the advance payments, if any, are attributable to services, whether such services are integral to the provisions of goods or items, and whether any portions of the advance payments that are attributable to non-integral services are less than five percent of the total contract prices See Regulations sections 1 451-5(a)(2)(i) and (3)
 - c** A statement explaining that the advance payments will be included in income no later than when included in gross receipts for purposes of the applicant's financial reports See Regulations section 1 451-5(b)(1)(ii)
 - d** A statement explaining whether the inventorable goods exception of Regulations section 1 451-5(c) applies and if so, when substantial advance payments will be received under the contracts, and how the exception will limit the deferral of income

Schedule C-Changes Within the LIFO Inventory Method (see instructions)

Part I General LIFO Information

Complete this section if the requested change involves changes within the LIFO inventory method. Also, attach a copy of all **Forms 970**, Application To Use LIFO Inventory Method, filed to adopt or expand the use of the LIFO method.

- 1 Attach a description of the applicant's present and proposed LIFO methods and submethods for each of the following items
- a Valuing inventory (e.g., unit method or dollar-value method)

b Pooling (e.g., by line or type or class of goods, natural business unit, multiple pools, raw material content, simplified dollar-value method, inventory price index computation (IPIC) pools, vehicle-pool method, etc.)

c Pricing dollar-value pools (e.g., double-extension, index, link-chain, link-chain index, IPIC method, etc.)

d Determining the current-year cost of goods in the ending inventory (i.e., most recent acquisitions, earliest acquisitions during the current year, average cost of current-year acquisitions, or other permitted method)
- 2 If any present method or submethod used by the applicant is not the same as indicated on Form(s) 970 filed to adopt or expand the use of the method, attach an explanation.
- 3 If the proposed change is not requested for all the LIFO inventory, attach a statement specifying the inventory to which the change is and is not applicable.
- 4 If the proposed change is not requested for all of the LIFO pools, attach a statement specifying the LIFO pool(s) to which the change is applicable.
- 5 Attach a statement addressing whether the applicant values any of its LIFO inventory on a method other than cost. For example, if the applicant values some of its LIFO inventory at retail and the remainder at cost, identify which inventory items are valued under each method.
- 6 If changing to the IPIC method, attach a completed Form 970.

Part II Change in Pooling Inventories

- 1 If the applicant is proposing to change its pooling method or the number of pools, attach a description of the contents of, and state the base year for, each dollar-value pool the applicant presently uses and proposes to use.
- 2 If the applicant is proposing to use natural business unit (NBU) pools or requesting to change the number of NBU pools, attach the following information (to the extent not already provided) in sufficient detail to show that each proposed NBU was determined under Regulations section 1.472-8(b)(1) and (2):
- a A description of the types of products produced by the applicant. If possible, attach a brochure.

b A description of the types of processes and raw materials used to produce the products in each proposed pool.

c If all of the products to be included in the proposed NBU pool(s) are not produced at one facility, state the reasons for the separate facilities, the location of each facility, and a description of the products each facility produces.

d A description of the natural business divisions adopted by the taxpayer. State whether separate cost centers are maintained and if separate profit and loss statements are prepared.

e A statement addressing whether the applicant has inventories of items purchased and held for resale that are not further processed by the applicant, including whether such items, if any, will be included in any proposed NBU pool.

f A statement addressing whether all items including raw materials, goods-in-process, and finished goods entering into the entire inventory investment for each proposed NBU pool are presently valued under the LIFO method. Describe any items that are not presently valued under the LIFO method that are to be included in each proposed pool.

g A statement addressing whether, within the proposed NBU pool(s), there are items both sold to unrelated parties and transferred to a different unit of the applicant to be used as a component part of another product prior to final processing.
- 3 If the applicant is engaged in manufacturing and is proposing to use the multiple pooling method or raw material content pools, attach information to show that each proposed pool will consist of a group of items that are substantially similar. See Regulations section 1.472-8(b)(3).
- 4 If the applicant is engaged in the wholesaling or retailing of goods and is requesting to change the number of pools used, attach information to show that each of the proposed pools is based on customary business classifications of the applicant's trade or business. See Regulations section 1.472-8(c).

Schedule D-Change in the Treatment of Long-Term Contracts Under Section 460, Inventories, or Other
Section 263A Assets (see instructions)

Part I Change in Reporting Income From Long-Term Contracts (Also complete Part III on pages 7 and 8)

- 1 To the extent not already provided, attach a description of the applicant's present and proposed methods for reporting income and expenses from long-term contracts Also, attach a representative actual contract (without any deletion) for the requested change If the applicant is a construction contractor, attach a detailed description of its construction activities
- 2a Are the applicant's contracts long-term contracts as defined in section 460(f)(1) (see instructions)? . . . ☐ Yes ☐ No
- b If "Yes," do all the contracts qualify for the exception under section 460(e) (see instructions)? . . . ☐ Yes ☐ No
If line 2b is "No," attach an explanation
- c If line 2b is "Yes," is the applicant requesting to use the percentage-of-completion method using cost-to-cost under Regulations section 1.460-4(b)? . . . ☐ Yes ☐ No
- d If line 2c is "No," is the applicant requesting to use the exempt-contract percentage-of-completion method under Regulations section 1.460-4(c)(2)? . . . ☐ Yes ☐ No
If line 2d is "Yes," attach an explanation of what cost comparison the applicant will use to determine a contract's completion factor
If line 2d is "No," attach an explanation of what method the applicant is using and the authority for its use
- 3a Does the applicant have long-term manufacturing contracts as defined in section 460(f)(2)? . . . ☐ Yes ☐ No
- b If "Yes," explain the applicant's present and proposed method(s) of accounting for long-term manufacturing contracts
- c Attach a description of the applicant's manufacturing activities, including any required installation of manufactured goods
- 4 To determine a contract's completion factor using the percentage-of-completion method
- a Will the applicant use the cost-to-cost method in Regulations section 1.460-4(b)? . . . ☐ Yes ☐ No
- b If line 4a is If "No," is the applicant electing the simplified cost-to-cost method (see section 460(b)(3) and Regulations section 1.460-5(c))? . . . ☐ Yes ☐ No
- 5 Attach a statement indicating whether any of the applicant's contracts are either cost-plus long-term contracts or Federal long-term contracts

Part II Change in Valuing Inventories Including Cost Allocation Changes (Also complete Part III on pages 7 and 8)

- 1 Attach a description of the inventory goods being changed
- 2 Attach a description of the inventory goods (if any) NOT being changed
- 3a Is the applicant subject to section 263A? If " No," go to line 4a . . . ☐ Yes ☐ No
- b Is the applicant's present inventory valuation method in compliance with section 263A (see instructions)?
If " No," attach a detailed explanation . . . ☐ Yes ☐ No

4a Check the appropriate boxes below

- Identification methods
- Specific identification
- FIFO
- LIFO
- Other (attach explanation)
- Valuation methods
- Cost
- Cost or market, whichever is lower
- Retail cost
- Retail, lower of cost or market
- Other (attach explanation)

b Enter the value at the end of the tax year preceding the year of change . . .

Inventory Being Changed		Inventory Not Being Changed
Present method	Proposed method	Present method

- 5 If the applicant is changing from the LIFO inventory method to a non-LIFO method, attach the following information (see instructions)
- a Copies of Form(s) 970 filed to adopt or expand the use of the method
- b Only for applicants requesting advance consent. A statement describing whether the applicant is changing to the method required by Regulations section 1.472-6(a) or (b), or whether the applicant is proposing a different method
- c Only for applicants requesting an automatic change. The statement required by section 22.01(5) of the Appendix of Rev Proc 2008-52 (or its successor)

Part II

Method of Cost Allocation (Complete this part if the requested change involves either property subject to section 263A or long-term contracts as described in section 460 (see instructions))

Section A-Allocation and Capitalization Methods

Attach a description (including sample computations) of the present and proposed method(s) the applicant uses to capitalize direct and indirect costs properly allocable to real or tangible personal property produced and property acquired for resale, or to allocate and, where appropriate, capitalize direct and indirect costs properly allocable to long-term contracts. Include a description of the method(s) used for allocating indirect costs to intermediate cost objectives such as departments or activities prior to the allocation of such costs to long-term contracts, real or tangible personal property produced, and property acquired for resale. The description must include the following:

- 1
- The method of allocating direct and indirect costs (i.e., specific identification, burden rate, standard cost, or other reasonable allocation method)
- 2
- The method of allocating mixed service costs (i.e., direct reallocation, step-allocation, simplified service cost using the labor-based allocation ratio, simplified service cost using the production cost allocation ratio, or other reasonable allocation method)
- 3
- The method of capitalizing additional section 263A costs (i.e., simplified production with or without the historic absorption ratio election, simplified resale with or without the historic absorption ratio election including permissible variations, the U.S. ratio, or other reasonable allocation method)

Section B-Direct and Indirect Costs Required To Be Allocated

Check the appropriate boxes showing the costs that are or will be fully included, to the extent required, in the cost of real or tangible personal property produced or property acquired for resale under section 263A or allocated to long-term contracts under section 460. Mark "N/A" in a box if those costs are not incurred by the applicant. If a box is not checked, it is assumed that those costs are not fully included to the extent required. Attach an explanation for boxes that are not checked.

	Present method	Proposed method
1 Direct material		
2 Direct labor		
3 Indirect labor		
4 Officers' compensation (not including selling activities)		
5 Pension and other related costs		
6 Employee benefits		
7 Indirect materials and supplies		
8 Purchasing costs		
9 Handling, processing, assembly, and repackaging costs		
10 Offsite storage and warehousing costs		
11 Depreciation, amortization, and cost recovery allowance for equipment and facilities placed in service and not temporarily idle		
12 Depletion		
13 Rent		
14 Taxes other than state, local, and foreign income taxes		
15 Insurance		
16 Utilities		
17 Maintenance and repairs that relate to a production, resale, or long-term contract activity		
18 Engineering and design costs (not including section 174 research and experimental expenses)		
19 Rework labor, scrap, and spoilage		
20 Tools and equipment		
21 Quality control and inspection		
22 Bidding expenses incurred in the solicitation of contracts awarded to the applicant		
23 Licensing and franchise costs		
24 Capitalizable service costs (including mixed service costs)		
25 Administrative costs (not including any costs of selling or any return on capital)		
26 Research and experimental expenses attributable to long-term contracts		
27 Interest		
28 Other costs (Attach a list of these costs)		

Part III

Method of Cost Allocation (see instructions) (continued)

Section C-Other Costs Not Required To Be Allocated (Complete Section C only if the applicant is requesting to change its method for these costs)

	Present method	Proposed method
1 Marketing, selling, advertising, and distribution expenses		
2 Research and experimental expenses not included in Section B, line 26		
3 Bidding expenses not included in Section B, line 22		
4 General and administrative costs not included in Section B		
5 Income taxes		
6 Cost of strikes		
7 Warranty and product liability costs		
8 Section 179 costs		
9 On-site storage		
10 Depreciation, amortization, and cost recovery allowance not included in Section B, line 11		
11 Other costs (Attach a list of these costs)		

Schedule E-Change in Depreciation or Amortization (see instructions)

Applicants requesting approval to change their method of accounting for depreciation or amortization complete this section
Applicants **must** provide this information for each item or class of property for which a change is requested
Note: See the **List of Automatic Accounting Method Changes** in the instructions for information regarding automatic changes under sections 56, 167, 168, 197, 1400I, 1400L, or former section 168. **do not** file Form 3115 with respect to certain late elections and election revocations (see instructions).

1

Is depreciation for the property determined under Regulations section 1 167(a)-11 (CLADR)?

☐

Yes

☐

No

If "Yes," the only changes permitted are under Regulations section 1 167(a)-11(c)(1)(iii)

2

Is any of the depreciation or amortization required to be capitalized under any Code section (e g , section 263A)?

☐

Yes

☐

No

If "Yes," enter the applicable section ▶ _____

3

Has a depreciation, amortization, or expense election been made for the property (e g , the election under sections 168(f)(1), 179, or 179C)?

☐

Yes

☐

No

If "Yes," state the election made ▶ _____

4a

To the extent not already provided, attach a statement describing the property being changed Include in the description the type of property, the year the property was placed in service, and the property's use in the applicant's trade or business or income-producing activity

b

If the property is residential rental property, did the applicant live in the property before renting it?

☐

Yes

☐

No

c

Is the property public utility property?

☐

Yes

☐

No

5

To the extent not already provided in the applicant's description of its present method, attach a statement explaining how the property is treated under the applicant's present method (e g , depreciable property, inventory property, supplies under Regulations section 1 162-3, nondepreciable section 263(a) property, property deductible as a current expense, etc)

6

If the property is not currently treated as depreciable or amortizable property, attach a statement of the facts supporting the proposed change to depreciate or amortize the property

7

If the property is currently treated and/or will be treated as depreciable or amortizable property, provide the following information for both the present (if applicable) and proposed methods

a

The Code section under which the property is or will be depreciated or amortized (e g , section 168(g))

b

The applicable asset class from Rev Proc 87-56, 1987-2 C B 674, for each asset depreciated under section 168 (MACRS) or under section 1400L, the applicable asset class from Rev Proc 83-35, 1983-1 C B 745, for each asset depreciated under former section 168 (ACRS), an explanation why no asset class is identified for each asset for which an asset class has not been identified by the applicant

c

The facts to support the asset class for the proposed method

d

The depreciation or amortization method of the property, including the applicable Code section (e g , 200% declining balance method under section 168(b)(1))

e

The useful life, recovery period, or amortization period of the property

f

The applicable convention of the property

g

A statement of whether or not the additional first-year special depreciation allowance (for example, as provided by section 168(k), 168(l), 168(m), 168(n), 1400L(b), or 1400N(d)) was or will be claimed for the property If not, also provide an explanation as to why no special depreciation allowance was or will be claimed

TY 2014 Accounting Fees Schedule

Name: Walter and Lucille Rubin Foundation Inc

EIN: 26-0369836

Category	Amount	Net Investment Income	Adjusted Net Income	Disbursements for Charitable Purposes
Professional Fees	9,850	9,850		0

Note: To capture the full content of this document, please select landscape mode (11" x 8.5") when printing.

TY 2014 Depreciation Schedule

Name: Walter and Lucille Rubin Foundation Inc

EIN: 26-0369836

Description of Property	Date Acquired	Cost or Other Basis	Prior Years' Depreciation	Computation Method	Rate / Life (# of years)	Current Year's Depreciation Expense	Net Investment Income	Adjusted Net Income	Cost of Goods Sold Not Included
LAND	2009-01-01	49,161		L		0	0		
BUILDING	2009-01-01	196,645	25,000	SL	39 0000000000000	5,042	5,042		
LAND	2009-01-01	244,816		L		0	0		
BUILDING	2009-01-01	979,262	124,499	SL	39 0000000000000	25,109	25,109		
LAND	2009-01-01	147,232		L		0	0		
BUILDING	2009-01-01	588,928	74,876	SL	39 0000000000000	15,101	15,101		
BUILDING IMPROVEMENTS	2011-08-01	160,362	9,766	SL	39 0000000000000	4,112	4,112		

TY 2014 Investments Corporate Stock Schedule

Name: Walter and Lucille Rubin Foundation Inc

EIN: 26-0369836

Name of Stock	End of Year Book Value	End of Year Fair Market Value
Securities - Aventura Cap Mgmt	162,721	216,300
Securities - UBS (1016)	997,318	1,103,113
Securities - Merrill Lynch	651,918	893,605

TY 2014 Investments - Land Schedule**Name:** Walter and Lucille Rubin Foundation Inc**EIN:** 26-0369836

Category/ Item	Cost/Other Basis	Accumulated Depreciation	Book Value	End of Year Fair Market Value
LAND	49,161	0	49,161	42,695
BUILDING	196,645	30,042	166,603	203,113
LAND	244,816	0	244,816	449,933
BUILDING	979,262	149,608	829,654	753,167
LAND	147,232	0	147,232	244,833
BUILDING	588,928	89,977	498,951	528,567
BUILDING IMPROVEMENTS	160,362	13,878	146,484	0

TY 2014 Investments - Other Schedule

Name: Walter and Lucille Rubin Foundation Inc

EIN: 26-0369836

Category/ Item	Listed at Cost or FMV	Book Value	End of Year Fair Market Value
Lioneye Offshore Fund Ltd	AT COST	2,500,000	3,676,570
Riverloft Fund	AT COST	3,000,000	3,168,042
Impala Fund	AT COST	1,110,883	1,192,801

TY 2014 Other Assets Schedule

Name: Walter and Lucille Rubin Foundation Inc

EIN: 26-0369836

Description	Beginning of Year - Book Value	End of Year - Book Value	End of Year - Fair Market Value
Other Receivables	2,481,807	222,902	222,902

TY 2014 Other Expenses Schedule**Name:** Walter and Lucille Rubin Foundation Inc**EIN:** 26-0369836

Description	Revenue and Expenses per Books	Net Investment Income	Adjusted Net Income	Disbursements for Charitable Purposes
Bank/Brokerage Service Fees	14,634	14,634		0
Filing Fees	383	383		0
Utilities	3,558	3,558		0
Repairs & Maintenance	51,027	51,027		0
Insurance	11,342	11,342		0
Property Management Fees	30,055	30,055		0
Miscellaneous	346	346		0
Bank Charges	45	45		0
Travel	2,744	2,744		0
Amortization	783	783		0

TY 2014 Other Professional Fees Schedule

Name: Walter and Lucille Rubin Foundation Inc

EIN: 26-0369836

Category	Amount	Net Investment Income	Adjusted Net Income	Disbursements for Charitable Purposes
Professional Fees	2,480	2,480		0

TY 2014 Taxes Schedule**Name:** Walter and Lucille Rubin Foundation Inc**EIN:** 26-0369836

Category	Amount	Net Investment Income	Adjusted Net Income	Disbursements for Charitable Purposes
Federal Excise Taxes	3,500	0		0
Real Estate Taxes	48,365	48,365		0
License & Fees	439	439		0

TY 2014 Reduced user fee statement**Name:** Walter and Lucille Rubin Foundation Inc**EIN:** 26-0369836

Under Section 15.07 of Rev. Proc. 99-1?	Taxpayer Business/Person Name, TIN	Amount of User Fee Submitted	Member of Consolidated Group Business/Person Name, TIN	Section 481(a) Adjustment	Number of Years Present Method Used
				0	

TY 2014 GeneralDependencySmall

Name: Walter and Lucille Rubin Foundation Inc
EIN: 26-0369836

Business Name or Person Name:

Taxpayer Identification Number:

Form, Line or Instruction

Reference: Form 3115 Other Type Of Accounting Method Continuation

Regulations Reference:

Description:

Attachment Information: See Codes in Part I, Line 1(a)

TY 2014 GeneralDependencySmall

Name: Walter and Lucille Rubin Foundation Inc
EIN: 26-0369836

Business Name or Person Name:

Taxpayer Identification Number:

Form, Line or Instruction

Reference: Form 3115 Additional Explanation

Regulations Reference:

Description:

Attachment Information: FORM 3115, PART II, LINE 12Explanation of Present and Proposed Methods of AccountingItems Being Changed: The taxpayer is changing its methods of accounting to comply with the final tangible property regulations via the following concurrent automatic method changes under Rev. Proc. 2015-14, Sec. 10.11 (5).Present Method for Items Being Changed: Taxpayer currently uses the following methods of accounting:Repairs and Maintenance: Expenditures that bring tangible property back to their normal operating condition are deducted as ordinary business expenses under IRC Sec. 162.Capital Expenditures: Large capital expenditures are normally capitalized.Improvement Costs: Generally, asset upgrades, additions, and enhancements are capitalized.Unit of Property (UOP): Each itemized fixed asset on taxpayer's depreciation schedule is generally considered to be a unit of property.Routine Maintenance: The safe harbor of Reg. Section 1.263(a)-3(i) is not currently being utilized, nor could it have been used. However, normal expenditures that keep property in its ordinarily efficient operating condition are deducted as ordinary and necessary business expenses.Capitalization Criteria: The taxpayer analyzes the facts and circumstances to determine whether an expenditure should be capitalized. For instance, expenditures for assets with a useful life greater than one year are typically capitalized.Materials and Supplies: The cost of materials and supplies is currently deducted in the year paid or incurred.Acquisition Costs: Amounts paid in connection with the acquisition of an asset generally are capitalized as part of the new fixed asset. These costs are deducted if the asset is not actually acquired.Proposed Method for Items Being Changed: Taxpayer proposes to adopt the rules contained in the final tangible property regulations as follows: DCN #184 Reg. 1.263(a)-1(a) General rule for capital expenditures Reg. 1.162-4(a) Deduct repairs and maintenance Reg. 1.263(a)-3 Amounts paid to improve tangible property Reg. 1.263(a)-3(b) Definitions, amounts paid to improve property Reg. 1.263(a)-3(d) Requirement to capitalized improvement costs Reg. 1.263(a)-3(e) Determining the unit of property Reg. 1.263(a)-3(g)(1) Certain costs incurred during an improvement Reg. 1.263(a)-3(i) Safe harbor for routine maintenance on property Reg. 1.263(a)-3(j) Capitalization of betterments Reg. 1.263(a)-3(k) Capitalization of restorations Reg. 1.263(a)-3(l) Capitalization of adaptations to a new or different use Reg. 1.263(a)-3(l)(2) Capitalization of new or different building adaptations Reg. 1.263(a)-3(o) Treatment of capital expenditures Reg. 1.263(a)-3(p) Recovery of capitalized amounts DCN #186 Reg. 1.162-3(a)(1) Nonincidental materials and supplies Reg. 1.162-3(c) Materials and supplies definition DCN #187 Reg. 1.162-3(a)(2) Incidental materials and supplies Reg. 1.162-3(c) Materials and supplies definition DCN #192 Reg. 1.263(a)-2 Amounts paid to acquire or produce tangible property Reg. 1.263(a)-2(d) Requirement to capitalize acquired or produced property Reg. 1.263(a)-2(e) Defense or perfection of title to property Reg. 1.263(a)-2(f) Transaction costs to facilitate acquisition Reg. 1.263(a)-2(g) Treatment of capital expenditures Reg. 1.263(a)-2(h) Recovery of capitalized amountsRegulation Authorizing the Proposed Method: Taxpayer proposes to change to the following specific methods of accounting:Repairs and Maintenance: Under Reg. 1.162-4, taxpayer will currently deduct repair and maintenance expenditures related to tangible property that otherwise would not have to be capitalized under Regs. 1.263(a)-1, 1.263(a)-2, 1.263(a)-3 or any other regulation.Capital Expenditures: Taxpayer will employ the general rules and definitions related to acquisition and improvement expenditures under Reg. 1.263(a)-1, along with Regs. 1.263(a)-2, 1.263(a)-3 and 1.162-4, to determine when an expenditure should be expensed or capitalized.Improvement Costs: Taxpayer will adopt Reg. 1.263(a)-3, along with Regs. 1.263(a)-1, 1.263(a)-2 and 1.162-4, to determine when an expenditure should be expensed or capitalized.Unit of Property: Taxpayer will employ the criteria in Reg. 1.263(a)-3(e) for determining a unit of property (UOP). Each building and its structural components will be treated as a UOP.Routine Maintenance: Taxpayer will adopt the routine maintenance safe harbor in Reg. 1.263(a)-3(i) as its method of accounting for routine maintenance expenditures.Capitalization Criteria: Taxpayer will follow the Reg. 1.263(a)-3 restoration, adaptation and be

TY 2014 GeneralDependencySmall

Name: Walter and Lucille Rubin Foundation Inc
EIN: 26-0369836

Business Name or Person Name:

Taxpayer Identification Number:

Form, Line or Instruction

Reference: Form 3115 Additional Explanation

Regulations Reference:

Description:

Attachment Information: Form 3115, Part II, Line 13Description of Trade or
BusinessApplicant business is commercial real estate. Business
code is 531120. The applicant has only one trade or business.

TY 2014 GeneralDependencySmall

Name: Walter and Lucille Rubin Foundation Inc
EIN: 26-0369836

Business Name or Person Name:

Taxpayer Identification Number:

Form, Line or Instruction

Reference: Form 3115 Additional Explanation

Regulations Reference:

Description:

Attachment Information: Form 3115, Part IV, Line 25Methodology Used to Determine the Section 481(a) AdjustmentTaxpayer believes there is no Section 481 adjustment due to extensive past use of Section 179 deduction and bonus depreciation deduction to expense the cost of acquired, produced, or improved property. Taxpayer has no capitalized costs that would be deductible under proposed accounting method.

Form 3115	Requested Designated Accounting Method Change Numbers	Statement	1
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Change Numbers on Part I, line 1a

184, 186, 187, 192