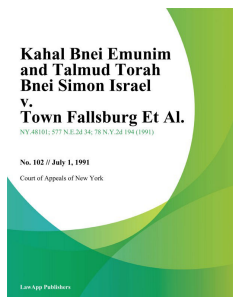


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[78 N.Y.2d 194 Page 198] Opinion OF THE COURT Kahal Bnei Emunim (Kahal) is a religious corporation which operates a religious and educational institutionu003cbr /u003e in Brooklyn, New York. It enjoys Federal income tax exemption under section 501 (c) (3) of the Internal Revenue Code (26u003cbr /u003e USC) and its Brooklyn property has been exempted from real estate taxes by the City of New York.

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