

Internal Revenue Service

Department of the Treasury

District
Director

450 Golden Gate Ave., Box 36020
San Francisco, Calif. 94102

> The Regents of the University
of California
c/o The Office of the General
Counsel
590 University Hall
2200 University Avenue
Berkeley, CA 94720

Person to Contact: Desk Officer

Telephone Number: (415) 556-5353

Refer Reply to: EP/EO

Date: JAN 27 1981

Re: Request for Verification of Qualification
under Section 501(c)(3) of the Internal
Revenue Code of 1954

Dear Regents:

This is in reference to your letter of January 21, 1981 requesting verification of the tax exempt status of The Regents of the University of California under section 501(c)(3) of the Internal Revenue Code of 1954.

In our letter of September 14, 1939, Code IT:P:T:1 CQ, it was held that you are entitled to exemption under the provisions of section 101(6) of the Revenue Act of 1938 which corresponds to section 501(c)(3) of the Internal Revenue Code of 1954.

Our records indicate that you are the regularly constituted state university of the State of California created by a state legislature act of 1868; that you are engaged in educational activities; that your income is derived from investments, endowments, tuition, and miscellaneous sources; and that your income is used in furtherance of your educational activities.

It appears that you and your constituent schools are entitled to exemption under the provisions of section 101(6) of the Revenue Act of 1938 which corresponds to section 501(c)(3) of the Internal Revenue Code of 1954.

In addition, it appears from our records that there has been no change in your purpose, character, or method of operation. Accordingly, our letter of September 14, 1939 is still in effect.

Donors may deduct contributions to you as provided in section 170 of the Internal Revenue Code of 1954 (formerly section 23(o) of the Internal Revenue Code of 1938). Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for Federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Internal Revenue Code of 1954.

You are not required to file Form 990, Return of Organization Exempt from Income Tax, because you are a State institution, the income of which is excluded from gross income under section 115(a) of the Internal Revenue Code of 1954.

The Regents of the University of California

You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T. In this letter, we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,

A handwritten signature in dark ink, appearing to be "J. M. ...".
Acting
District Director