

Department of the Treasury

SEP 11 1974

District Director

Internal Revenue Service

Date:

In reply refer to:

SEP 10 1974

6045426



A: FA1439:LSison
SF:EO:74-4080

249 Central Service Building
University of California, Santa Cruz
Santa Cruz, California 95064

Trusts, Gifts, and Foundations

Based on information supplied, and assuming your operations will
qualify for recognition of exemption, we
have determined you are exempt from Federal income tax under section
501(c)(3) of the Internal Revenue Code.

We have further determined you are not a private foundation within
the meaning of section 509(a) of the Code, because you are an
organization described in section 509(a)(3).

You are not liable for social security (FICA) taxes unless you
file a return of contributions as provided in the Federal
Insurance Contributions Act. You are not liable for the taxes imposed
under the Federal Unemployment Tax Act (FUTA).

Since you are not a private foundation, you are not subject to
the excise taxes under Chapter 42 of the Code. However, you are not
automatically exempt from other Federal excise taxes. If you have any
questions about excise, employment, or other Federal taxes, please
let us know.

Donors may deduct contributions to you as provided in section
170 of the Code. Bequests, legacies, devises, transfers, or gifts to
you are, for your use, deductible for Federal estate and gift tax
under the applicable provisions of sections 2055.

If your purposes, character, or method of operation is changed,
the effect of the change on

name or address.

If your gross receipts each year are normally more than \$5,000, you are required to file Form 990, Return of Organization Exempt From Income Tax, by the 15th day of the 6th month after the close of your annual accounting period. The law imposes a penalty of \$10 a day, up to a maximum of \$5,000, for failure to file a return on time.

You are not required to file Federal income tax returns unless you are required to do so by the Internal Revenue Code, section 6011 of the Code. If you are subject to this tax, you must file an income tax return on Form 990. In this letter, we are not determining whether you are a business as defined in section 513 of the Code.

You need an employer identification number even if you have no employees. If an employer identification number was not entered on your application, a number will be assigned to you and you will be advised of it. Please use that number on all returns you file and in all correspondence with the Internal Revenue Service.

Sincerely yours

T. J. P. [Signature]

T. J. P. [Signature]

Reference is made to our letter dated August 30, 1971.