



U. S. TREASURY DEPARTMENT INTERNAL REVENUE SERVICE WASHINGTON 25, D. C.

APR 27 1964

IN REPLY REFER TO T:R:EO: 1 SMic

Bozeman Deaconess Foundation (formerly Bozeman Deaconess Hospital) 15 West Lamme Street Bozeman, Montana

Gentlemen:

DATE OF 1954 I.R.CODE EXEMPTION Feb. 18, 1946 SECTION 501(C)(3)

Change of name and amended purposes.

FILE MATERIAL WITH DISTRICT DIRECTOR OF INTERNAL REVENUE

Helena, Montana

We appreciate your cooperation in submitting the above mentioned material, which we have noted on our records and made a part of our files.

In accordance with the requirements for retaining an exempt status any future changes in your organization's character, purposes, method of operation, name or address should also be brought to the attention of your District Director.

The above ruling is applicable to you under your present name.

Chief, Ex

ef Exempt Organizations Branch

TREASURY DEFERENCES TO CONTRACT OF THE PROPERTY OF THE PROPERT

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Feb. 18, 1986

Boseman Deadoness Hospital o/o A. R. Grantham 15 West Lamme Boseman, Montana

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It is the opinion of this office, based upon the evidence presented, that you are exempt from Federal income tax under the provisions of section 101 (6) of the Internal Revenue Code and corresponding provisions of prior revenue acts, as it is shown that you are organized and operated exclusively for charitable purposes.

Accordingly, you will not be required to file returns of income unless you change the character of your organization, the purposes for which you were organized, or your method of operation. Any such changes should be reported immediately to the collector of internal revenue for your district in order that their effect upon your exemptatatus may be determined.

Since any organization which is exampt from Federal income tax under the provisions of section 101 of the Internal Revenue Code also is exampt from the capital stock tax parsuant to the express provisions of section 1201(a)(1) of the Internal Revenue Code, you will not be required to file capital stock tax returns for future years so long as the exemption from income tax is effective.

Furthermore, under substantially identical authority contained in sections: 1426 and 1607 of the Code and/or corresponding provisions of the Social Security Act, the employment taxes imposed by such statutes are not applicable to remuneration for services performed in your employ so long as you meet the conditions prescribed above for retention of an exempt statue for income tax purposes.

Boseman Deaconess Hospital

Contributions made to you are deductible by the donors in arrivating at their taxable net income in the manner and to the extent provided by section 23(o) and (q) of the Internal Revenue Code and corresponding provisions of prior revenue acts.

Bequests, legacies, devises or transfers, to or for your use are deductible in arriving at the value of the net estate of a decedent for estate tax purposes in the sanner and to the extent provided by sections 812(d) and 801(a)(3) of the Code and/or corresponding provisions of prior revenue acts. Gifts of property to you are deductible in computing net gifts for gift tax purposes in the manner and to the extent provided in section 1004(a)(2)(B) and 1004(b)(2) and (3) of the Code and/or corresponding provisions of prior revenue acts.

The collector of internal revenue for your district is being advised of this action.

By direction of the Commissioner.

Respectfully,

Signed: 3. I. McLarney

Acting Deputy Commissioner.

A. E. Grantham, being first duly sworn upon his oath, deposes and says: I am the Business Manager of Boxaman Deaconess hospital, located at 15 West Lamme St., in Bozaman, Montana. Pursuant to a communication from Federal Security Agency, U. S. Fublic Health Service, dated April 2, 1946, requiring duly certified copy of a letter snowing that the Internal Revenue Eureau have classified Bozaman Deaconess Hospital as a tax exempt institution, I have this to say: The above and foregoing is a true and correct copy of letter from Treasury Department, dated February 18, 1946, and I have compared the above with the original and I certify that this is an exact copy of said communication. Further affiant sayeth pos.

Subscribed and sworn to before me this 3rd day of May, 1946.

Notary Public for the State of Montana, residing at Bozeman, Montana. My commission expires Sept. 17th, 1948.