College of Commerce and Industry

DEPARTMENT OF ECONOMICS



February 22, 1994

Ms. Yvonne Engel
The Lynde and Harry Bradley Foundation
777 East Wisconsin Ave. Suite 2285
Milwaukee WI 53202-5395

T. Warrer

Dear Ms. Engel:

Dr. Robert McCormick has forwarded to me your request for a copy of the Clemson University Foundation IRS determination letter. If the enclosed IRS letter does not fully answer your needs, please let me know.

On behalf of the Applied Economics Research Group and the Clemson University Economics Department, I want to express my appreciation to the Lynde and Harry Bradley Foundation for the generosity of its grant. Your support for graduate education and faculty enhancement comes at a critical time for us. We will endeavor to be good stewards of the resources you have provided. Shortly you will receive a confirmation of your gift from the Clemson University Foundation.

Yours truly,

John T. Warner

Professor of Economics Acting Department Head



U. S. TREASURY DEPARTMENT INTERNAL REVENUE SERVICE

DISTRICT DIRECTOR 901 SUMTER STREET

ORAWER R
COLUMBIA 1, SOUTH CAROLINA
December 15, 1958

Entered in PCG

IN REPLY REFER TO

A:R:EMM:ib

Clemson College Foundation Clemson Agricultural College Clemson, South Carolina

Gentlemen:

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 501(c)(3) of the Internal Revenue Code, as it is shown that you are organized and operated exclusively for educational purposes.

Accordingly, you are not required to file income tax returns 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 District Director of Internal Revenue, Columbia, South Carolina, in order that their effect upon your exempt status may be determined.

You are required, however, to file information returns, Form 990-A, annually, with the District Director of Internal Revenue, Columbia, South Carolina, so long as this exemption remains in effect. This form is required to be filed on or before the 15th day of the fifth month following the close of your annual accounting period.

Contributions made to you are deductible by the donors in computing their taxable income in the manner and to the extent provided by section 170 of the Internal Revenue Code.

Bequests, legacies, devises, or transfers, to or for your use are deductible in computing the value of the net estate of a decedent for estate tax purposes in the manner and to the extent provided by section 2055 and section 2106(a)(2) of the Internal Revenue Code. 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 2522(a)(2) and section 2522(b)(2) and (3) of the Code.

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No liability is incurred by you for the taxes imposed under the Federal Insurance Contributions Act (social security taxes) unless you have filed a waiver of exemption certificate in accordance with the applicable provisions of such Act. In the event you desire social security coverage for your employees but have not filed a waiver certificate you should take the matter up with this office. Tax liability is not incurred by you under the Federal Unemployment Tax Act by virtue of section 3306(c)(8) of such Act.

Very truly yours,

FRANCIS G. DUEHAI District Director

By:

William M. Lumb J. + D. Chief, Audit Division