

TAX-EXEMPT STATUS

Stanford University is an exempt institution organized and operated exclusively for educational purposes. Gifts to the University qualify for the highest income tax deduction permitted under Federal and California law; gifts and bequests are also exempt from gift, estate, and inheritance taxes. Gifts to the University from private foundations are qualified distributions not subject to excise tax, and the University is also a qualified transferee of the assets of private foundations on their termination.

The most frequently applicable sections of Federal and California law are these:

Exempt status of Stanford University:

Section 501(c) (3), Internal Revenue Code

Section 94020, California Education Code

Article XIII, §§3(e), 26, California Constitution

Income tax deduction:

Section 170, Internal Revenue Code (individuals and corporations)

Section 17214, California Revenue and Taxation Code (individuals)

Section 24357, 24359, California Revenue and Taxation Code (corporations)

Gift tax:

Section 2522, Internal Revenue Code

Section 15441(d), California Revenue and Taxation Code

Estate tax:

Section 2055, Internal Revenue Code

Inheritance tax:

Section 13841(d), California Revenue and Taxation Code

Private Foundations:

Section 4942(g), Internal Revenue Code (qualifying distributions)

Section 507(b), Internal Revenue Code (termination)



STANFORD UNIVERSITY

TO WHOM IT MAY CONCERN:

Attached are the following documents, which bear on Stanford University's tax exemption:

- 1) Letter dated March 26, 1996, from the Internal Revenue Service clarifying and confirming Stanford University's tax-exempt status.
- 2) The original tax exemption letter issued by the IRS on February 3, 1927.
- 3) On October 20, 1970, the Service determined that Stanford University was not a private foundation as defined in Section 509(a) of the Internal Revenue Code of 1954. A photocopy of this original letter is enclosed.

These are the documents that Stanford University regularly submits to foundations and other donors who ask for documentation pertaining to Stanford's exempt status. Please note that the University appears in the IRS publication *Cumulative List of Organizations* under "Stanford University Board of Trustees of the Leland Stanford Junior Un, Stanford, Ca." as a tax-exempt organization. There has been no change in Stanford's tax-exempt status since the initial determination in 1927.

The official name for Stanford University is THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY. All gifts and bequests to the University should use this name. The federal tax identification number for the University is 94-1156365.

Enclosures

Internal Revenue Service

Department of the Treasury

RECEIVED

APR 22 1996

District
Director

General Counsel's Office

The Board of Trustees of the Leland Stanford Junior University
M. Suzanne Calandra, Controller
857 Serra Street
Room 100
Stanford, CA 94305-6200

Date: 26 March 1996

Contact: Dave Eichel

Telephone:
(415) 522-6961

Dear Ms. Calandra:

This is in reference to your request for clarification of exempt status of The Board of Trustees of the Leland Stanford Junior University, commonly known as Stanford University.

Our records indicate that The Board of Trustees of the Leland Stanford Junior University was held to be exempt from Federal income tax as an educational institution on February 3, 1927. A photocopy of this original letter is enclosed.

On October 20, 1970 the Service determined that The Board of Trustees of the Leland Stanford Junior University was not a private foundation as defined in section 509(a) of the Internal Revenue Code of 1954. A photocopy of this original letter is enclosed.

From the information submitted and our records, we have determined that The Board of Trustees of the Leland Stanford Junior University is an organization exempt from Federal income tax under section 501(a) of the Internal Revenue Code of 1986, as amended, as an organization described in section 501(c)(3). Furthermore, we have determined that you are not a private foundation because you are the type of organization described in sections 509(a)(1) and 170(b)(1)(A)(ii) of the Code.

If you have any questions, please call Dave Eichel at the above number or you may call Michael Nicchitta at (213) 725-7676.

Sincerely yours,



Richard R. Orosco
District Director, Los Angeles

enclosures

Phone Contact: J. E. Acton
Phone Number: 202-964-0259

Date: SEP 8 1974 In reply refer to.
T:MS:EO:R:2-4

The Board of Trustees of the
Leland Stanford Junior
University
Attn: Iris Brest
301 Encina Hall
Stanford, California 94305

This is in reference to the request for a ruling submitted on your behalf by Mr. Reuben Clark in a letter dated August 29, 1974.

Our records indicate that you were held to be exempt from Federal income tax as an educational institution on February 3, 1927, and on October 20, 1970 you were determined not to be a private foundation as defined in section 509(a) of the Internal Revenue Code of 1954. You are now requesting a clarification of that determination.

From the information submitted, we have determined that you are not a private foundation because you are the type of organization described in sections 509(a)(1) and 170(b)(1)(A)(ii) of the Code.

We are notifying your key District Director, San Francisco, of this action.

Sincerely yours,

E. D. Coleman
Chief, Rulings Section 2
Exempt Organizations Branch

GENERAL S. _____ OFFICE
STANFORD UNIVERSITY

9-12 1974

To	Info	Act	Sign	To	Info	Act	Sign
DHP							
MAN				D.C.			
GTG				SGH			
RMB				TWN			
IE				DHF			
BCS				So. Cal.			
				SWH			

Department of the Treasury

Internal Revenue Service
Washington, DC 20224

Date:

10-20-70

In reply refer to:



BOARD OF TRUSTEES OF THE LELAND
STANFORD JUNIOR UNIVERSITY
301 ENCINA HALL
STANFORD, CALIF

94305

Gentlemen:

Based on the information you recently submitted, we have classified you as an organization that is not a private foundation as defined in section 509(a) of the Internal Revenue Code.

Your classification is based on the assumption that your operations will be as stated in your notification. Any changes in your purposes, character, or method of operation must be reported to your District Director so he may consider the effect on your status.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "J. A. Teles", with a stylized flourish at the end.

Chief, Rulings Section
Exempt Organizations Branch

FORM 12-0714 (8-70) (CONTINUOUS)

Form 4553

(Use last)

Department of the Treasury
Internal Revenue Service

Notification Concerning Foundation Status

(Use this only if you are a private foundation)

☐ Classification code

☐ Letter code

Please print or type

Remove address label on front cover, and place it here.

Correct name, etc., if necessary.

Enter employer identification number or Social Security number of the person in charge.

34156365 2200000000 031000000 0 94 7

BOARD OF TRUSTEES OF THE LELAND

STANFORD JUNIOR UNIVERSITY

STANFORD CALIF 94305

Employer identification number

Please place an "X" in the one numbered block that applies to your organization, provide any additional information called for, and return the form promptly to the Internal Revenue Service Center, 11601 Roosevelt Boulevard, Philadelphia, Pennsylvania 19155. Do not check a block until you have read the instructions and Code definitions applicable to the block. Section references are to the Internal Revenue Code of 1954.

- 1 ☐ We are a private foundation within the meaning of section 507(c). (If you are a private foundation, are you claiming status as a operating foundation within the meaning of section 4942(j)(3)? ... ☐ Yes ☐ No If "Yes," attach a statement setting forth all the facts upon which you base your answer including an identification of the clause of section 4942(j)(3)(B) that is applicable.)

We are not a private foundation because we are:

2 ☐ A church. Section 170(b)(1)(A)(i).3 ☒ A school. Section 170(b)(1)(A)(ii).4 ☐ A hospital. Section 170(b)(1)(A)(iii).5 ☐ A medical research organization operated in conjunction with a hospital. Section 170(b)(1)(A)(iv).6 ☐ A Governmental unit. Section 170(b)(1)(A)(v).7 ☐ An organization operated for the benefit of a college or university owned or operated by a Governmental unit. Section 170(b)(1)(A)(vi).

(Complete the Financial Schedule on page 2.)

8 ☐ An organization that normally receives a substantial part of its support from a Governmental unit or from the general public. Section 170(b)(1)(A)(vii).

(Complete the Financial Schedule on page 2.)

9 ☐ An organization that normally receives no more than 33 1/3% of its support from gross investment income and more than 66 2/3% of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions, subject to certain exceptions. Section 507(c)(2).

(Complete the Financial Schedule on page 2.)

10 ☐ An organization operated solely for the benefit of and in connection with one or more of the organizations described in 2 through 9 (or for the benefit of one or more organizations described in section 501(c)(4), (5), or (6) and described in 9 above), but not controlled by disqualifying persons other than foundation managers. Section 507(c)(3).

(Attach a statement identifying and describing the organization(s) for whose benefit you are operated and the relationship between you and the organization(s).)

11 ☐ An organization organized and operated to test for public safety. Section 507(c)(4).12 ☐ We are not sure of our classification.

(Attach a copy of your most recently filed information return, Form 990-A, if you filed one, and a statement describing your operations and explaining why you are not sure of your classification. If you think you may be described in 7, 8, or 9, complete the Financial Schedule on page 2.)

I declare that I have examined the information entered on this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct and complete. (Must be signed by a principal officer, manager, or authorized trustee of the organization.)

(Signature)

July 29, 1970
(Date)

February 3, 1927.

IT:E:RE
LJM

The Leland Stanford Junior University,
c/o Wilson and Wilson,
14 Montgomery Street,
San Francisco, California.

Sirs:

Reference is made to the evidence submitted for use by the Bureau in determining the status of your organization for the purpose of Federal taxation.

It appears that Leland Stanford and Jane Lathrop Stanford, husband and wife, desiring to promote the public welfare by founding, endowing and maintaining a university upon an estate known as the Palo Alto Farm, conveyed to certain trustees, and their successors forever, certain described property. The trustees were authorized to manage and control the university; to maintain and educational system of the highest grade and to use the rents, issues and profits of the trust property in the execution of the trust.

In an affidavit dated December 29, 1926, it is stated that the Board of Trustees of the Leland Stanford Junior University is a body having corporate powers under the laws of the State of California; that it was formed solely for educational purposes, and that its actual activities are devoted to educational purposes.

The income of the organization is derived from investments, endowments, contributions and tuition. This income is expended exclusively for educational purposes. Some of the income may be credited to surplus but the income therefrom is used only for educational purposes. No part of the income inures or may inure to the benefit of any private individual or shareholder.

Based on the foregoing, it is held that the purposes and activities of the organization are such as to bring it within the meaning and intent of Section 231(6) of the Revenue Act of 1926 and corresponding provisions of prior Revenue Acts. Accordingly you are advised that returns of net income will not be required for 1926 and prior years and future returns will not be required so long as there is no change in the organization, its purposes and method of operation.

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The Leland Stanford Junior University.

Any changes in the form of organization or method of operation as shown by the evidence submitted, should be immediately reported by you to the Collector of Internal Revenue for your district in order that the effect of such changes upon your present exempt status may be determined.

The exemption referred to in this letter does not apply to taxes levied under other titles or provisions of the Revenue Act of 1926 and prior Revenue Acts except in so far as the exemption is granted expressly under those provisions to corporations enumerated in Section 231 of the Acts.

Inasmuch as your organization comes within the provisions of Section 231(6) of the status, contributions to it constitute allowable deductions in the income tax returns of individual donors to the extent and in the manner provided in Section 214(a) (10) of the the Revenue Act of 1926 and corresponding provisions of prior Revenue Acts.

A copy of this ruling is being furnished the Collector of Internal Revenue for your district.

By direction of the Commissioner.

Respectfully,

(Signed) O. R. Nash

Assistant to the Commissioner.

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