

U. S. TREASURY DEPARTMENT

INTERNAL REVENUE SERVICE

DISTRICT DIRECTOR

MILWAUKEE 1, WISCONSIN Federal Bldg., P. O. Box 1157

IN REPLYING REFER TO: AUD:PEO:RIM Br.2-8600 Ext.431 Room 402 Entered in PCG

May 15, 1958

Marquette University High School Foundation, Inc. 3hOl West Wisconsin Avenue Milwaukee 8. Wisconsin

Gentlemen:

It is the opinion of this office, based upon the evidence presented, that you are exempt from Federal income tax as an organization described in section 501(c)(3) of the Internal Revenue Code of 1954, as it is shown that you are organized and operated exclusively for religious and 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, Tilwaukee, isconsin in order that their effect upon your exempt status may be determined.

It will not be necessary for you to file the annual return of information, Form 990A, generally required of organizations exempt under section 501(c)(3) of the Internal Revenue Code of 1954, as you come within the specific exceptions contained in section 6033(a) of the Code.

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 1951 Code.

Bequests, legacies, devises or transfers to or for your use are deductible in computing the value of the taxable estate of a decedent for Federal estate tax purposes in the manner and to the extent provided by sections 2055 and 2106 of the 1954 Code. Gifts of property to or for your use are deductible in computing taxable gifts for Federal gift tax purposes in the manner and to the extent provided by section 2522 of the 1954 Code.

Form 4653 (June 1970) Department of the Treasury Internal Revenue Service Notification Concernit	ng Foundation Statuto	Do not write in this space (For IRS use only) Classification code Letter code	
Name of organization Marquette (Iniversity High	Employer Identification Number	
School Foundation,	Inc.	23-7110781	
Number and street 3401 West Wisconsin	Avenue		
Name of organization Marquette C School Foundation, Number and street 3401 West Wisconsin City or town, State and ZIP code Milwaukee, Wisconsi			
Please place an "X" in the one numbered block that applicalled for, and return the form promptly to the Internal Re Pennsylvania 19155. Do not check a block until you have re block. Section references are to the Internal Revenue Coc	venue Service Center, 11601 Roose ead the instructions and Code d	evelt Boulevard, Philadelphia	
We are a private foundation within the meaning of section 5 operating foundation within the meaning of section 4942(j) all the facts upon which you base your answer including an	(3)? ☐ Yes ☐ No If "Yes,"	'attach a statement setting tori	
We are not a private foundation because we are:	An organization that normally receives no more than its support from gross investment income and more than of its support from contributions, membership fees, and gro		
2- A church. Section 170(b)(1)(A)(i). 3 A school. Section 170(b)(1)(A)(ii).	subject to certain exception	receipts from activities related to its exempt functions subject to certain exceptions. Section 509(a)(2).	
4 A hospital. Section 170(b)(1)(A)(iii).	(Complete the Financial S	cheduie on page 2.,	
 A medical research organization operated in conjunction with a hospital. Section 170(b)(1)(A)(iii). A Governmental unit. Section 170(b)(1)(A)(v). 	connection with one or mo in 2 through 9 (or for the	An organization operated solely for the benefit of and connection with one or more of the organizations describe in 2 through 9 (or for the benefit of one or more organizations described in section 501[c](4), (5), or (6) and all described in 9 above), but not controlled by disqualified persons other than foundation managers. Section 509(a)(3)	
7 An organization operated for the benefit of a college or university owned or operated by a Governmental unit. Section	described in 9 above), I persons other than founda		
170(b)(1)(A)(iv). (Complete the Financial Schedule on page 2.)	(Attach a statement identi tion(s) for whose benefit y ship between you and the	fying and describing the organiz you are operated and the relatio organization(s).)	
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)(vi).			
(Complete the Financial Schedule on page 2.)	An organization organized safety. Section 509(a)(4).	and operated to test for publ	
We are not sure of our classification. (Attach a copy of your most recently filed information return and explaining why you are not sure of your classification. If Schedule on page 2.)			
I declare that I have examined the information entered on the first firs			
XW William & Dolan X	<u> </u>	(Date)	
(Signature)		(pate)	
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Marquette University High School Foundation, Inc. Milwaukee, Wisconsin

Marquette University High School Foundation, Inc. was organized and is operated solely for the benefit of Marquette University High School, Milwaukee, Wisconsin. The Foundation makes annual distributions to the High School. No distributions are made to any other organizations.



U.S. TREASURY DEPARTMENT

INTERNAL REVENUE SERVICE WASHINGTON, D.C. 20224

IN REPLY REFER TO T:R:EO:S OCS

IUN 15 1965

National Catholic Welfare Conference 1312 Massachusetts Avenue, N.W. Washington, D.C. 20005

Gentlemen:

We have The Official Catholic Directory for 1965 submitted by you pursuant to our ruling dated March 25, 1946, in which it was held that the agencies and instrumentalities, as well as the educational, charitable, and religious institutions operated, supervised, or controlled by or in connection with the Roman Catholic Church in the United States, its territories or possessions, appearing on pages 6 to 851, inclusive, of The Official Catholic Directory for 1945, are entitled to exemption from Federal income tax under the provisions of section 101(6) of the Internal Revenue Code of 1939, which corresponds to section 501(c)(3) of the 1954 Code.

The Official Catholic Directory for 1965 recently submitted by you shows the names and addresses of all agencies and instrumentalities, as well as all educational, charitable, and religious institutions operated by the Roman Catholic Church in the United States, its territories and possessions through its agencies and instrumentalities, such as archdioceses, dioceses and religious orders in existence at the time the Directory was published. It is understood that each of these institutions is a nonprofit organization, that no part of the net earnings thereof inures to the benefit of any individual, and that no substantial part of the activities of any organization is for the promotion of legislation.

Accordingly, it is held, based upon the information previously submitted, and on which the ruling of March 25, 1946, is based, that the agencies and instrumentalities and the educational, charitable, and religious organizations operated, supervised, or controlled by or in connection with the Roman Catholic Church in the United States, its territories or possessions, and appearing in the list of such institutions contained in the United States Edition of The Official Catholic Directory for 1965, are entitled to exemption from Federal income tax under the provisions of section 501(c)(3) of the Code of 1954.

National Catholic Welfare -2-Conference

The aforementioned agencies, instrumentalities and institutions are not required to file Federal income tax returns so long as they retain a tax-exempt status, unless they are subject to the unrelated business tax imposed by section 511 of the Code and are required to file Form 990-T in order to report unrelated business taxable income. This is also applicable to your organization.

The above-mentioned agencies, instrumentalities, and institutions are not required to file the annual information return, Form 990-A.

Contributions made to the agencies, instrumentalities, and institutions referred to above, and appearing in the United States Edition of The Official Catholic Directory for 1965, are deductible by donors as provided in section 170 of the Code. Bequests, legacies, devises, transfers or gifts to or for the use of such agencies, instrumentalities, and institutions are deductible for Federal estate and gift tax purposes as provided in sections 2055, 2106, and 2522 of the Code.

You and your exempt subordinate units (agencies, instrumentalities, and institutions) are not liable for the taxes imposed under the Federal Insurance Contributions Act. Inquiries about the waiver of exemption certificates should be addressed to your District Director.

You and your exempt subordinate units are not liable for the tax imposed under the Federal Unemployment Tax Act.

One copy of The Official Catholic Directory for the current year should be submitted annually to the National Office of the Internal Revenue Service for each Internal Revenue District in which one or more of your subordinate units are located. Five additional copies of the Directory should be submitted for the use of and retention in the National Office. The required copies of the Directory should be submitted to the National Office as soon as they are available. A statement signed by one of your principal officers stating whether or not the information upon which your original group ruling was based is applicable in all respects to the new subordinate units listed in the Directory for the current year should also be submitted to the National Office at that time.

National Catholic Welfare -3-Conference

Any new subordinate units added by your organization must meet the organizational and operational test defined in section 1.501(c)(3)-1 of the Regulations.

The District Directors concerned by the changes made in your roster have been notified.

Very truly yours,

Chief, Exempt Organizations Branch

R. J. Stakem