

20150765

Internal Revenue Service
P.O. Box 2508
Cincinnati, OH 45201

Department of the Treasury

Date: August 20, 2014

The Sand County Foundation Inc.
131 W. Wilson St, Ste 610
Madison, WI 53703

Employer Identification Number:

39-6089450

Person to Contact - ID Number:

Ms. Lee - 02-03193

Contact Telephone Number:

877-829-5500 Toll-Free

Form 990 Required:

Yes

Dear Sir or Madam:

On March 17, 2014 you notified the Internal Revenue Service of your intent to terminate your foundation status as a private foundation under section 507(b)(1)(B) of the Internal Revenue Code of 1986 and become a public charity. In our letter of May 9, 2008, we stated that you would be treated as a public charity until the expiration of your 60-month advance ruling period.

Based on the information you submitted at the end of the advance ruling period, we determined that you have terminated your private foundation status under the provisions of section 507(b)(1)(B) of the Code. Accordingly, as of January 1, 2008 you have been reclassified as a public charity described in sections 509(a)(1) and 170(b)(1)(A)(vi) of the Code. Since your exempt status wasn't under consideration, you continue to be classified an organization exempt from Federal income tax under section 501(c)(3) of the Code.

For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, *Compliance Guide for 501(c)(3) Public Charities*, which describes your recordkeeping, reporting, and disclosure requirements.

Because this letter could help resolve questions about your exempt status and foundation status, you should keep it in your permanent records.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely,



Director, Exempt Organizations

INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201

Entered

DEPARTMENT OF THE TREASURY

Date: **MAY 09 2008**

THE SAND COUNTY FOUNDATION INC
C/O HAMANG B PATEL
PO BOX 1806
MADISON, WI 53701

Employer Identification Number:
39-6089450
DLN:
308023029
Contact Person:
CARLY D YOUNG ID# 31494
Contact Telephone Number:
(877) 829-5500

60 Month Period Ends:
December 31, 2012
Addendum Applies:
No

Dear Applicant:

We have received your notification of intent to terminate your private foundation status under section 507(b)(1)(B) of the Internal Revenue Code during a 60 month period beginning January 1, 2008.

The information submitted indicates that you intend to operate as an organization described in section 509(a)(2) of the Code during the 60 month period.

Based on your proposed activities and support, it is held that you can reasonably be expected to terminate your private foundation status under section 507(b)(1)(B) of the Code. Accordingly, you will be treated as a public charity described in section 509(a)(2) of the Code for an advance ruling period of 60 months beginning January 1, 2008.

Within 90 days after the end of your 60 month period, you must establish to the satisfaction of the Internal Revenue Service that you have qualified as an organization which meets the requirements of paragraph (1), (2), or (3) of section 509(a) of the Code for the 60 month period. If you do establish that fact, you will be so classified for all purposes beginning with the first day of the first taxable year of the 60 month period and, thereafter, so long as you continue to meet the requirements of section 509(a)(1), (2), or (3). If, however, you do not meet these requirements for the 60 month period, you will be classified as a private foundation as of the first day of the first taxable year of the 60 month period.

If you satisfy the requirements of section 507(b)(1)(B) of the Code at the end of your 60 month period, you will not be subject to the provisions of section 507(a), (c), or (g) of the Code.

Grantors and donors may rely on the determination that you are not a private foundation until 90 days after the end of your advance ruling period. If you submit the required information within the 90 days, grantors and contributors may continue to rely on the advance determination until the Service makes a final determination of your foundation status.

Letter 2245 (DO/CG)

THE SAND COUNTY FOUNDATION INC

You are required to file Form 990-PF, Return of Private Foundation or Section 4947(a)(1) Trust Treated as a Private Foundation, until you complete your 60 month termination and are classified as a section 509(a)(2) organization. Form 990-PF must be filed by the 15th day of the fifth month after the end of your annual accounting period. The law imposes a penalty of \$20 a day, up to a maximum of \$10,000 or 5 percent of your gross receipts (whichever is less), for failure to file a return on time unless there is reasonable cause for the delay. For organizations with gross receipts exceeding \$1,000,000 in any year, the penalty is \$100 per day per return, unless there is reasonable cause for the delay. The maximum penalty for an organization with gross receipts exceeding \$1,000,000 shall not exceed \$50,000. This penalty may also be charged if a return is not complete, so please be sure your return is complete before you file it.

If you do not pay the tax imposed by section 4940 of the Code for any taxable year or years during the 60 month period, and it is subsequently determined that such tax is due for such year or years, you will be liable for interest in accordance with section 6601 of the Code. Since any failure to pay such taxes during the 60 month period is due to reasonable cause, the penalty under section 6651 with respect to the tax imposed by section 4940 shall not apply.

If the heading of this letter indicate that an addendum applies, the addendum enclosed is an integral part of this letter.

Because this letter could help resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

We have sent a copy of this letter to your representative as indicated in your power of attorney.

If you have any questions, please contact the person whose name and telephone number are shown in the heading of this letter.

Sincerely yours,



Robert Choi
Director, Exempt Organizations
Rulings and Agreements

Enclosure(s):
Form 872

Internal Revenue Service

Department of the Treasury

Entered in PCG P. O. Box 2508
Cincinnati, OH 45201

Date: July 18, 2003

Sand County Foundation, Inc.
P.O. Box 3186
Madison, WI 53704-0186

Person to Contact:

Tracy Garrigus #31-07307
Customer Service Representative

Toll Free Telephone Number:

8:00 a.m. to 6:30 p.m. EST
877-829-5500

Fax Number:

513-263-3756

Federal Identification Number:

39-6089450

Dear Sir or Madam:

This is in response to your request of July 18, 2003 regarding your organization's tax exempt status.

In December 1965 we issued a determination letter that recognized your organization as exempt from federal income tax. Our records indicate that your organization is currently exempt under section 501(c)(3) of the Internal Revenue Code.

Based on information subsequently submitted, we classified your organization as one that is an exempt operating foundation described in section 4940(d)(2) of the Code.

Your organization is required to file Form 990-PF, *Return of Private Foundation or Section 4947(a)(1) Trust Treated as a Private Foundation*. Form 990-PF must be filed by the 15th day of the 5th month after the end of your organization's annual accounting period. The law imposes a penalty of \$20 a day, up to a maximum of \$10,000, when a return is filed late, unless there is reasonable cause for the delay. However, the maximum penalty charged cannot exceed \$5,000 or 5 percent of the organization's gross receipts for the year, whichever is less. This penalty may also be imposed if a return is not complete, so please be sure the return is complete before filing it.

If your organization's purposes, character, method of operation, or sources of support have changed, please let us know so we can consider the effect of the change on the organization's exempt status and foundation status.

All exempt organizations (unless specifically excluded) are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$100 or more paid to each of their employees during a calendar year. Your organization is not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Donors may deduct contributions made to your organization as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to your organization or for its use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

Sand County Foundation, Inc.
39-6089450

Your organization is not required to file federal income tax returns unless it is subject to the tax on unrelated business income under section 511 of the Code. If your organization is subject to this tax, it must file an income tax return on the Form 990-T, *Exempt Organization Business Income Tax Return*. In this letter, we are not determining whether any of your organization's present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

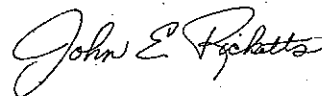
Section 6104 of the Internal Revenue Code requires you to make your organization's annual return available for public inspection without charge for three years after the due date of the return. The law also requires organizations that received recognition of exemption on July 15, 1987, or later, to make available for public inspection a copy of the exemption application, any supporting documents and the exemption letter to any individual who requests such documents in person or in writing. Organizations that received recognition of exemption before July 15, 1987, and had a copy of their exemption application on July 15, 1987, are also required to make available for public inspection a copy of the exemption application, any supporting documents and the exemption letter to any individual who requests such documents in person or in writing. For additional information on disclosure requirements, please refer to Internal Revenue Bulletin 1999 - 17.

Because this letter could help resolve any questions about your organization's exempt status and foundation status, you should keep it with the organization's permanent records.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

This letter affirms your organization's exempt status.

Sincerely,



John E. Ricketts, Director, TE/GE
Customer Account Services

**MICHAEL BEST
& FRIEDRICH**
Attorneys at Law ^{LLP}

Writer's Direct Line:
(608) 283-2241

One South Pinckney Street
P.O. Box 1806
Madison, Wisconsin 53701-1806
FAX (608) 283-2275
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Milwaukee, Wisconsin
Chicago, Illinois

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A Global Association of
122 Independent Firms

**CONFIDENTIAL
ATTORNEY-CLIENT PRIVILEGE**

October 8, 1997

VIA FAX

Mr. J. Reed Coleman
Chair
Madison-Kipp Corporation
201 Waubesa Street
Madison, WI 53704-3037

Brent M. Haglund, Ph.D.
President
Sand County Foundation
201 Waubesa Street
Madison, WI 53704-3037

RE: Bradley Foundation Relationship

Dear Reed and Brent:

Please find enclosed a memo prepared by my colleague, Sara Jensen, which states, in effect, that there is no problem proceeding with the Bradley Foundation in an environmental grant partnership.

If you have any questions, please feel free to contact Sara or me. I am planning on attending the meeting tomorrow afternoon.

Very truly yours,

MICHAEL BEST & FRIEDRICH LLP


David J. Hanson

cc: Sara B. Jensen
Enclosure.
DJH/l-k
EXPCLEINT836190001V-K0539,W52/10/97

97-10-29

Post-It™ brand fax transmittal memo 7671		# of pages > 7
To Bill Schamber	From Brent Haglund	
Co. Bradley Fdn.	Co. Sand C. Fdn.	
Dept.	Phone # 608.242.5319	
Fax # 414.291.9991	Fax #	

OCT 30 1997

97 4/19

MEMORANDUM

TO: David J. Hanson
FROM: Sara Berman Jensen *SBJ*
DATE: October 8, 1997
RE: Sand County Foundation

This memorandum addresses how an on-going relationship between the Lynde and Harry Bradley Foundation (the "Bradley Foundation") and the Sand County Foundation ("SCF") could affect the tax-exempt status of SCF. As set forth below, we have explored two methods of structuring this relationship, neither of which should have a negative impact on SCF's tax-exempt status.

FACTS

SCF is a tax-exempt charitable organization pursuant to Section 501(c)(3) of the Internal Revenue Code of 1986, as amended (the "Code"). The purpose of SCF is to promote education, scientific research, and sound ethical standards in the areas of land management and environmental activity. SCF was recognized as a tax exempt private operating foundation ("POF") in 1965 and received a ruling that it also qualified as an exempt operating foundation ("EOF") in 1987.

The Bradley Foundation is a private foundation, also exempt from tax pursuant to Code Section 501(c)(3). The Bradley Foundation is not a POF or EOF. Currently, the Bradley Foundation is not making significant grants for environmental causes, but is considering entering into a relationship with SCF to begin making such grants. Two proposals are being considered. First, the Bradley Foundation could give large grants to SCF (amounts might range from \$500,000 to \$2 million annually), which SCF would redistribute for environmental causes. Alternatively, the Bradley Foundation would pay a fee to SCF to review environmental grant proposals and make recommendations on grant allocations. As set forth below, neither structure should jeopardize the tax-exempt status of SCF.

DISCUSSION**I. Grant to SCF from Bradley.**

In structuring the relationship between SCF and the Bradley Foundation, one possibility is for the Bradley Foundation to make large annual grants to SCF, which SCF would redistribute in the form of smaller grants for environmental causes. Because SCF qualifies as a POF and EOF, and because that status gives SCF

certain benefits not available to other private foundations (such as exemption from the 2% tax on a private foundation's investment income) this memorandum addresses whether the receipt of large grants from the Bradley Foundation could interfere with that classification. As discussed below, it appears that SCF's status as a POF and EOF would not be jeopardized by the relationship with the Bradley Foundation. To understand the basis of this conclusion, it is important to understand the difference between public charities, private foundations, POFs and EOFs.

All organizations exempt from tax pursuant to Code Section 501(c)(3) are either private foundations or non-private foundations (often referred to as "public charities"). Public charities are generally organizations that receive the bulk of their financial support from the general public, or from other public charities. Because of the broad base of financial support for public charities, they are entitled to certain federal income tax advantages not available to private foundations. Neither SCF nor the Bradley Foundation is a public charity.

Any organization that is not a public charity is a private foundation. Private Foundations are generally closely regulated by the federal government, but two sub-classes of private foundations exist, POFs and EOFs, that are less strictly regulated. The requirements to qualify as a POF or an EOF are set forth below.

A. Private Operating Foundations.

A POF is a private foundation that generally devotes its assets or income to the active conduct of a charitable activity, rather than making grants to other organizations. To qualify as a POF, an organization must meet an income test, and one of three alternate tests: (i) the assets test, (ii) the endowment test or (iii) the support test. Code Section 4942(j)(3).

i. The Income Test.

To meet the income test, a private foundation must make "qualifying distributions" directly for the active conduct of the activities constituting the purpose or function for which it is organized, equal to at least 85% of the lesser of (i) its "adjusted net income" or (ii) its "minimum investment return." Treas. Reg. §53.4942(b)-1.

Qualifying distributions are defined in Treas. Reg. §53.4942(a)-3(a)(2) as direct distributions for (i) amounts paid to accomplish charitable purposes, other than contributions to nonoperating foundations or organizations controlled by the contributing private foundation or disqualified persons; (ii) amounts paid for assets used in carrying out the organization's charitable purpose; or (iii) amounts constituting set-asides for

charitable purposes approved by the IRS. The expenditure, however, must also be direct, which means it must be used by the foundation, rather than by or through one or more grantee organizations. Treas. Reg. §53.4942(b)-1(b)(1). Thus grants to other organizations are not included as direct expenditures, even where the grantee organization's activities further specific charitable operations of the grantor.

The definition of qualifying distributions at first blush appears to prevent SCF from receiving substantial grants from the Bradley Foundation and redistributing such funds to other grantee organizations. Upon closer look, however, the POF rules should not interfere with that relationship, because gifts and grants are not included in the measurement of funds that must be distributed in "qualifying distributions."

As noted, a POF must distribute at least 85% of the lesser of its (i) adjusted net income or (ii) minimum investment return, in qualifying distributions. An organization's minimum investment return is generally equal to 5% of the value of its assets not used directly in carrying out its exempt function. Adjusted net income is gross income, less allowable deductions (with certain modifications). Gross income, however, does not include gifts, grants or contributions received by the organization. Treas. Reg. §53.4942(a)-2(d)(1).

Because gifts, grants and contributions are excluded from the definition of adjusted net income, the receipt of large gifts from the Bradley Foundation (and the redistribution of such amounts) should not affect SCF's ability to meet the income test. SCF, however, must also meet one of the three alternate tests: (i) the assets test, (ii) the endowment test or (iii) the support test.

SCF has previously relied on the endowment test in satisfying the POF definition. Thus, rather than review each alternate test in detail, this memorandum focuses on the endowment test to determine if the anticipated relationship with the Bradley Foundation will interfere with SCF's ability to satisfy that requirement.

ii. The Endowment Test.

The endowment test requires direct distributions of at least two-thirds of a foundation's "minimum investment return." As noted above, the minimum investment return is generally 5% of the value of a foundation's assets which are not used directly in carrying out its exempt function. Treas. Reg. §53.4942(a)-2. Thus, in practice the endowment test requires that an organization use 3.33% of its endowment for the direct conduct of its exempt activities. Treas. Reg. §53.4942(b)-2(b). The definitions under the endowment test are generally the same as

those for the income test. Thus, an organization with a minimum investment return that is less than its adjusted net income will always meet the endowment test if it meets the income test.

Based on the information set forth above, it appears that the receipt and redistribution of large grants from the Bradley Foundation should not interfere with SCF's ability to meet the endowment test, so long as SCF continues to use 3.33% of its endowment directly in carrying out its own exempt activities. Likewise, such amounts should not interfere with SCF's ability to meet the income test. Thus, the anticipated relationship with the Bradley Foundation should not jeopardize SCF's status as a POF.

B. Exempt Operating Foundations.

EOFs are POFs that meet three additional requirements. The POF must (i) have been publicly supported organization for at least ten years or be a qualified POF prior to January 1, 1983; (ii) have no more than 25% of its governing body made up of disqualified individuals; and (iii) have no officers that are disqualified individuals. Code Section 4940(d). SCF was a POF prior to January 1, 1983. Accordingly, the anticipated relationship with the Bradley Foundation should have no impact on SCF's status as an EOF, unless someone from the Bradley Foundation is appointed as an officer or Board member of SCF and that individual is a "disqualified individual."

Disqualified individuals are (i) substantial contributors, (ii) owners of more than 20% of the voting power of a corporation which is a substantial contributor or (iii) any member of the family of any of the foregoing disqualified individuals. IRC §4940(d)(3)(B). "Substantial contributor" is defined in IRC §507(d)(2) as any person giving more than \$5,000 to a private foundation, if such amount is more than 2% of the total contributions received by the foundation before the close of the taxable year. Thus, it is likely that the Bradley Foundation will be a substantial contributor. Thus no individual (or related family member) controlling 20% of the Bradley Foundation could be an officer of SCF. Furthermore, care should be taken in appointing any such person to the SCF Board of Directors, so that 75% of the Board is not made up of disqualified individuals.

It is my understanding that Reed Coleman serves as a member of the Board of Directors of both the Bradley Foundation and SCF. That dual role in itself should not be problematic, unless Mr. Coleman controls more than 20% of the voting power of the Bradley Foundation. I note, however, that Mr. Coleman may be required to refrain from voting on issues pertaining to the relationship between the two entities, depending on each organization's conflicts of interest policy. (This issue may turn on whether Mr. Coleman is compensated by either entity). Even if Mr.

Coleman is not required to refrain from such voting, he may wish to do so, to avoid even the appearance of impropriety.

II. Fee From Bradley Foundation to SCF.

Rather than having the Bradley Foundation give grants to SCF for redistribution, the relationship between the organizations could be structured so that SCF is paid a fee to review grant applications and make recommendations on distributions. This structure presents no risks for SCF's status as a POF or EOF (although the fees received would have to be spent in accordance with the POF rules outlined above). One possible concern, however, is that the fee could be taxed as unrelated business taxable income ("UBTI"). As set forth below, the activity that would generate the fee appears to be substantially related to SCF's exempt purpose and, therefore, the fee should not be treated as UBTI.

Code Section 511 imposes a tax on an organization's UBTI. Code Section 512 defines UBTI as an organization's gross income from an unrelated trade or business regularly carried on by it, less any deductions that are directly connected with the carrying on of the trade or business. Code Section 513 defines the phrase "unrelated trade or business" as any trade or business the conduct of which is not substantially related to an organization's exempt purpose.

Here, SCF's exempt purposes is to promote education, scientific research, and sound ethical standards in the areas of land management and environmental activity. By assisting the Bradley Foundation in grant-making that furthers environmental causes, SCF furthers its own exempt purpose. This is especially true considering that the Bradley Foundation would not make grants for environmental purposes without the assistance of SCF. Accordingly, fees paid by the Bradley Foundation to SCF should not be treated as UBTI.

III. Other Issues.

You have also asked whether SCF or the Bradley Foundation would be restricted in who it gives grants to, depending on the relationship between the organizations. Private foundations are subject to certain restrictions in grant-making. For example, grants cannot generally be made to carry on legislative propaganda. However, no unique restrictions should apply to SCF or the Bradley Foundation as a result of the relationship between the two organizations.

CONCLUSION

SCF's status as a POF and EOF should not be affected by its anticipated relationship with the Bradley Foundation.

Furthermore, amounts received by SCF as fees for consulting services to the Bradley Foundation should not be treated as UBTI.

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Internal Revenue Service

Department of the Treasury

Washington, DC 20224

Entered in POG

Sand County Foundation, Inc.
201 Waubesa Street
P.O. Box 3037
Madison, WI 53704

Person to Contact: WAYNE HARDESTY
Telephone Number: 202-566-4754

Refer Reply to: OP:E:EO:R:4

Date:

9 MAR 1987

Dear Applicant:

This is in reply to your letter of December 1, 1986, requesting a ruling that you be classified as an exempt operating foundation under section 4940(d)(2) of the Internal Revenue Code.

You have been held to be exempt under section 501(c)(3) of the Code and are classified as a private foundation described in section 509(a). You have also furnished information to show that as of January 1, 1983, you qualified as an operating foundation described in section 4942(j)(3).

Your purpose is to support and manage programs in land preservation, research and education in the natural sciences. The research programs are conducted on your nature reserve and augment the work of famed conservationist Aldo Leopold. The educational programs concentrate on field study and learning-by-doing at the L. R. Head Nature Study Center.

Prior to the annual meeting of June 5, 1986, your governing body consisted of six persons, of whom one is a "disqualified individual" within the meaning of section 4940(d)(3) of the Code. On June 5, the board of directors reappointed all of the existing members except for one, who resigned. The one board position remains vacant and one of the five current members is a disqualified individual. Accordingly, at least 75 percent of your governing body are not disqualified individuals. The governing body is also broadly representative of the general public since it is composed of officers of three local corporations, a newspaper publisher, a private citizen, and a college professor. None of your officers are disqualified individuals.

Section 4940(a) of the Code provides for the imposition on each private foundation which is exempt from taxation under section 501(a) for the taxable year, with respect to the carrying on of its activities a tax equal to 2 percent of the net investment income of such foundation for the taxable year.

Section 4940(d)(1) of the Code provides that no tax shall be imposed by this section on any private foundation which is an exempt operating foundation for the taxable year.

Sand County Foundation, Inc.

Section 4940(d)(2) of the Code, provides that the term "exempt operating foundation" means, with respect to any taxable year, any private foundation if --

- (A) such foundation is an operating foundation as defined in section 4942(j)(3),
- (B) such foundation has been publicly supported for at least 10 taxable years,
- (C) at all times during the taxable year, the governing body of such foundation consists of individuals at least 75 percent of whom are not disqualified individuals, and is broadly representative of the general public, and
- (D) at no time during the taxable year does such foundation have an officer who is a disqualified individual.

Section 4940(d)(3)(B) of the Code provides that the term "disqualified individual" means, with respect to any private foundation, an individual who is --

- (i) a substantial contributor to the foundation,
- (ii) an owner of more than 20% of --
 - (I) the total combined voting power of a corporation,
 - (II) the profits interest of a partnership, or
 - (III) the beneficial interest of a trust or unincorporated enterprise,which is a substantial contributor to the foundation, or
- (iii) a member of the family of an individual described in clause (i) or (ii).

Section 302(c)(3) of Public Law 98-369 (98 Stat. 781) provides that a foundation which was an operating foundation as defined in section 4942(j)(3) as of January 1, 1983, shall be treated as meeting the requirements of section 4940(d)(2)(B).

Section 1.170A-9(e)(3)(v) of the Income Tax Regulations indicates, in another context, that the governing body of an organization may be considered to represent the broad interests of the public if it is composed of community leaders such as elected or appointed officials, clergymen, educators, civic leaders, or other such persons representing a broad cross-section of the views and interests of the community.

Sand County Foundation, Inc.

Based on the informatin submitted, we have determined that you qualified as a private operating foundation within the meaning of section 4942(j)(3) of the Code as of January 1, 1983, your governing body is broadly representative of the general public, at least 75 percent of your governing body is not composed of disqualified individuals and none of your officers are disqualified individuals.

Accordingly, we make the following rulings:

1. You qualify as an exempt operating foundation described in section 4940(d)(2) of the Code.
2. You will not be subject to the excise tax imposed by section 4940(a) for years beginning after December 31, 1984, for which you meet the provisions set forth in section 4940(d)(2)(A) through (D).

These rulings are based on the understanding that there will be no material changes in the facts upon which they are based. Any such change should be reported to your key District Director.

We are informing your key District Director of this action. Please keep a copy of this ruling with your organization's permanent records.

Sincerely yours,

E. D. Coleman

E. D. Coleman
Director, Exempt Organizations
Technical Division

Internal Revenue Service
District Director

Department of the Treasury
December 18, 1986

Sand County Foundation, Inc.
201 Waubesa St.
Madison, WI 53704-5728

Date of Exemption: December, 1965
Internal Revenue Code Section: 501(c)(3)

Gentlemen:

Thank you for submitting the information shown below. We have made it a part of your file.

The changes indicated do not adversely affect your exempt status and the exemption letter issued to you continues in effect.

Please let us know about any future change in the character, purpose, method of operation, name or address of your organization. This is a requirement for retaining your exempt status.

Thank you for your cooperation.

Sincerely yours,

J.R. Starkey

Item Changed

From

To

Name

Louis Rollin Head Foundation, Inc



U. S. TREASURY DEPARTMENT
INTERNAL REVENUE SERVICE

DISTRICT DIRECTOR
Milwaukee, Wisconsin

December 27, 1965

DETERMINATION LETTER
MIL-EO-65-330

IN REPLY REFER TO
Form L-178
A:R:P:RLM

The Louis Rollin Head Foundation, Inc.
Femrite Road
Monona Village
Madison, Wisconsin - 53716

Gentlemen:

PURPOSE Educational and Charitable	
ADDRESS INQUIRIES & FILE RETURNS WITH DISTRICT DIRECTOR OF INTERNAL REVENUE Milwaukee, Wisconsin	
FORM 990-A RE- QUIRED	ACCOUNTING PERIOD ENDING
<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	June 30

On the basis of your stated purposes and the understanding that your operations will continue as evidenced to date or will conform to those proposed in your ruling application, we have concluded that you are exempt from Federal income tax as an organization described in section 501(c)(3) of the Internal Revenue Code. Any changes in operation from those described, or in your character or purposes, must be reported immediately to your District Director for consideration of their effect upon your exempt status. You must also report any change in your name or address.

You are not required to file Federal income tax returns so long as you retain an exempt status, unless you are subject to the tax on unrelated business income imposed by section 511 of the Code, in which event you are required to file Form 990-T. Our determination as to your liability for filing the annual information return, Form 990-A, is set forth above. That return, if required, must be filed on or before the 15th day of the fifth month after the close of your annual accounting period indicated above.

Contributions made to you are deductible by donors as provided in section 170 of the Code. Bequests, legacies, devises, transfers or gifts to or for your use are deductible for Federal estate and gift tax purposes under the provisions of section 2055, 2106 and 2522 of the Code.

You are not liable for the taxes imposed under the Federal Insurance Contributions Act (social security taxes) unless you file a waiver of exemption certificate as provided in such act. You are not liable for the tax imposed under the Federal Unemployment Tax Act. Inquiries about the waiver of exemption certificate for social security taxes should be addressed to this office, as should any questions concerning excise, employment or other Federal taxes.

This is a determination letter.

Very truly yours,

W. S. Stumpf

W. S. Stumpf
District Director

cc: Power of Attorney
McDermott, Will & Emery