Internal Revenue Service

Department of the Treasury

District Director

P.O. Box 2530, Los Angeles, CA 90053

The UCLA Foundation (University of California of Los Angeles Foundation) 10995 Le Conte Avenue Los Angeles, California 90024 Person to Contact: W.T. Mabry

Telephone Number: (213) 688-4170

Refer Reply to:EP/EO:EOG-2:D:WTM

Date: January 18, 1980

Gentlemen:

This is to acknowledge receipt of your letter dated January 9, 1980, regarding the determination letter for the above organization.

We do not up-date determination letters, however, our records do show that on October 10, 1949, the University of California of Los Angeles Foundation, formerly known as U.C.L.A. Progress Fund, Inc., was held to be exempt from Federal income tax as an organization described in section 501(c)(3) of the Internal Revenue Code and classified as an organization that is not a private foundation as defined in section 509(a) of the Code because it is an organization described in sections 509(a)(1) and 170(b)(1)(A)(iv) of the Code.

The exemption letter issued to you on October 10, 1949, continues to be in effect.

Thank you for your cooperation.

Sincerely yours,

/s/ W.T. Mabry

Disclosure Officer Exempt Organizations

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Internal Revenue Service Weekington, DC DOCA 21-27-70

U C L A POUNDATION W UCLA ALUMNI CENTER 402 MESTHOOD SLVD 808 ANGELES, CA

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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 503(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,

Chief, Rulings Section Exempt Organizations Branch

J. A. Quees V



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U. S. TREASURY DEPARTMENT WASHINGTON 25

OCT 10 1949

UCLA Progress Fund, Inc. c/o Lookheed Aircraft Corporation Burbank, California

Gentleman:

Reference is made to the information submitted for use in determining your status, for Federal income tax purposes, under section 101(6) of the Internal Revenue Code.

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, as it is shown that you are organized and operated exclusively for educational purposes.

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

Furthermore, under substantially identical authority contained in sections 1426 and 1607 of the code, the employment taxes imposed by such statute are not applicable to remuneration for services performed in your employ as long as you meet the conditions prescribed above for retention of an exempt status for Federal income tax purposes.

You will be required, however to file annually an information return on Form 990 with the collector of internal revenue, Los Angeles, California, as long as this exemption remains in effect. This form may be obtained from the collector and is required to be filed on or before the fifteenth day of the fifth month following the close of the annual accounting-period of the fund.

Contributions made to you are deductible by the donors in arriving at their taxable net income in the manner and to the extent provided by section 25(o) and (q) of the Internal Revenue Code.

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 manner and to the extent provided by sections \$12(d) and \$61(a)(3) of the 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 sections 1004(a)(2)(B) and 1004(b)(2) and (S) of the Code.

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

By direction of the Commissioner.

Very truly yours,

Deputy Commissioner