

Internal Revenue Service

Department of the Treasury

District
Director

UNIVERSITY OF ILLINOIS
FOUNDATION
224 ILLINI UNION
1401 WEST GREEN ST.
URBANA, ILLINOIS 61801

Person to Contact: LLOYD N. JACQUO

Telephone Number: 314-425-3037

Refer Reply to: 7204

Date: SEP 9 1983

Form Number: 990

Period Ended: JUNE 30, 1981

Exempt Status: 501(c)(3)

We are pleased to tell you that as a result of our examination for the above periods, we will continue to recognize your organization as tax exempt. Your return for the above period has been accepted as filed.

We have indicated below whether there is a change in your liability for the unrelated business income tax as provided by sections 511 through 515 of the Internal Revenue Code.

- A. ☒ There is no change.
- B. ☐ There is no change; however, income and expenses per Form 990-T were not reported correctly. See the attached schedule.
- C. ☐ You will receive an examination report explaining the proposed adjustments.
- D. ☐ Attached is an examination report explaining the proposed adjustments.

However, as a result of the examination, we have noted one or more areas that should be brought to your attention. Those which are applicable to you are indicated on the attachment(s) to this letter.

Sincerely yours,

J. R. [Signature]
District Director

Attachment(s)

Internal Revenue Service

District
Director

University of Illinois Foundation
224 Illinois Union
Urbana, IL 61801

Department of the Treasury,
Internal Revenue Service
P.O. Box 1123, Central Station
St. Louis, Mo 63138

Person to Contact:
P. Morrison TPA
Telephone Number:
314-425-5651
Refer Reply to:
EP/EO:7206
Date: JAN 27 1982

Dear Sir or Madam:

This is in response to your letter dated January 18, 1982, regarding your omission from the most recent Publication 78, Cumulative List of Organizations (Rev. 1-81).

Our records show that you are currently exempt from Federal income tax under Section 501(c)(3) of the Internal Revenue Code and that you are not a private foundation because you are an organization described in Section(s) 170(b)(1)(A)(iv) and 509(a)(1).

It is apparent that you were inadvertently omitted from the latest Cumulative List of Organizations; however, we have taken measures to ensure that you will be contained in the next revision of the List.

Your present deductibility of contributions is not affected by this omission.

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

This is an advisory letter.

Sincerely yours,

Robert A. LeBaube

Robert A. LeBaube
District Director

TAX STATUS OF THE UNIVERSITY OF ILLINOIS FOUNDATION

The University of Illinois Foundation is a tax-exempt organization and contributions made to the Foundation are deductible by the donors in arriving at their taxable net income in the manner and to the extent provided in Section 170 (b) (1) A of the Internal Revenue Code of 1986, as amended. Bequests, legacies, devises or transfers to or for the use of the Foundation are deductible in determining the value of the net estate of a decedent for tax purposes in the manner and to the extent provided in Section 2055 of the Internal Revenue Code of 1986, as amended. Gifts to the Foundation are deductible in computing net gifts for gift tax purposes in the manner and to the extent provided in Section 2522 of the Internal Revenue Code of 1986, as amended. (See attached letter from the Internal Revenue Service dated June 18, 1948. References to Code sections therein are to the Internal Revenue Code of 1939 which has been revised as provided above.)

The University of Illinois Foundation is classified as an exempt organization under 501 (c) (3) of the Code and is NOT a private foundation as defined in Section 509 (a) of the Internal Revenue Code. (See attached letter dated 11/09/70.)

Gifts to the University of Illinois Foundation qualify for maximum tax benefits permitted under Section 170 (b) (1) A of the Code.

The University of Illinois Foundation Tax Identification Number is 37-60006007.

Department of the Treasury

Internal Revenue Service
Washington, DC 20224

Date:

In reply refer to:

11-09-70



UNIVERSITY OF ILLINOIS FOUNDATION
ILLINI UNION BUILDING 224
URBANA, ILL

6180

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.

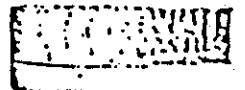
Your classification is based on the assumption that your operations will be as stated in your notification. Any changes in your purposes, character, or method of operation must be reported to your District Director so he may consider the effect on your status.

Sincerely yours,

A handwritten signature in cursive script, reading "J. A. Telesco".

Chief, Rulings Section
Exempt Organizations Branch

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





TREASURY DEPARTMENT
WASHINGTON 25



OFFICE OF
COMMISSIONER OF INTERNAL REVENUE

ADDRESS REPLY TO
COMMISSIONER OF INTERNAL REVENUE

AND REFER TO
IT:P:T:1
JLS

JUN 16 1948

U. OF I. FOUNDATION
JUN 22 1948

The University of Illinois Foundation
226 Illini Union Building
Urbana, Illinois

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 101(6) of the Internal Revenue Code and corresponding provisions of prior revenue acts, 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 method of operation. Any such changes should be reported immediately to the collector of internal revenue for your district 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 and/or corresponding provisions of the Social Security Act, the employment taxes imposed by such statutes are not applicable to remuneration for services performed in your employ so long as you meet the conditions prescribed above for retention of an exempt status for income tax purposes.

You will be required, however, to file annually, beginning with your current accounting period, an information return on Form 990 with the collector of internal revenue for your district so 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 15th day of the fifth month following the close of your annual accounting period.

The University of Illinois Foundation

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 23(o) and (q) of the Internal Revenue Code, as amended, and corresponding provisions of prior revenue acts.

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 812(d) and 851(a)(3) of the Code and/or corresponding provisions of prior revenue acts. 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 1004(a)(2)(B) and 1004(b)(2) and (3) of the Code and/or corresponding provisions of prior revenue acts.

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

Bureau rulings of March 11, 1936 and January 21, 1943 are hereby affirmed.

By direction of the Commissioner.

Respectfully,

E. J. McLaughlin
Deputy Commissioner.