

Internal Revenue Service

Department of the Treasury

District
Director

EO Group 7201
P.O. Box 632
Atlanta, Ga 30301

Charles E. Thompson
The University of Georgia
Office of the Vice President for
Business and Finance
Athens, Georgia 30602

Person to Contact:

Cheryl D. Brannen
Telephone Number:

404/221-4516
Refer Reply to:

7201:CB:TPA
Date:

1975

Dear Mr. Thompson:

This is in response to your letter concerning the exempt status of the University of Georgia which is a university in the University System of Georgia.

The Board of Regents of the University System of Georgia was determined by letter of August 31, 1943, to be a department or instrumentality of the State of Georgia; therefore, it is exempt from Federal income tax under section 115 of the Internal Revenue Code of 1954. Contributions made payable to the Board of Regents or to the University System for the use of a particular university of the system are deductible by the donors as provided in section 170 of the Code if the contribution or gift is made for exclusive public purpose. Bequests, legacies, devises, transfers or gifts made for exclusive public purpose are deductible for Federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

If we may be of further assistance, please contact us.

Sincerely yours,

Cheryl D. Brannen
Cheryl D. Brannen
Exempt Organizations Specialist

11/12/70

Internal Revenue Service

Date: NOV 5 1970 411-1-3:JFH



Board of Regents
University System of Georgia
c/o Jacob Wamsley
Business Affairs Officer
244 Washington Street
Atlanta, Georgia 30334

Gentlemen:

Organizations formed as instrumentalities or political subdivisions of a State which have been delegated the right to exercise part of the sovereign power of the State are not subject to Federal income tax.

Since the University System of Georgia is a political subdivision of the State of Georgia, contributions made payable to "The University System" for the use of a university of the system are deductible by the donors as provided under section 170 of the Internal Revenue Code if the contribution or gifts is made for exclusively public purposes.

Sincerely yours,

J. F. Huntington
J. F. Huntington
Exempt Organization Specialist