



UNIVERSITY OF ARKANSAS

University Tower Building, Suite 601
1123 South University
Little Rock, Arkansas 72204

OFFICE OF THE GENERAL COUNSEL

Telephone (501) 686-2500
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September 17, 1997

TO WHOM IT MAY CONCERN:

Re: Tax Exempt Status of the University of Arkansas

Dear Sir or Madam:

The University of Arkansas is a state institution of higher education established under Arkansas law. As such, it is an organization described within Internal Revenue Code § 170 (b)(1)(A)(v), in that it is described in IRS Code § 170 (C)(1). The University also falls within Code § 170 (b)(1)(A) (other than under subsections vii and viii). It may also fall within the provisions of IRS Code § 170(b)(1)(A)(ii) and (iii) as an educational organization. It has been exempt from federal income tax for many years as an instrumentality of the State of Arkansas. Enclosed is a copy of a letter from University files which evidences the tax exempt status.

Sincerely,

Harold J. Evans
Associate Vice President for Legal
Affairs--Research and Technology

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C O P Y

IT:P:ER
MLS

University of Arkansas
Fayetteville, Arkansas

Gentlemen:

Reference is made to the information furnished for use in determining your status for Federal income tax purposes.

The information shows that you are owned, maintained and operated as an instrumentality of the State of Arkansas, and as such, are not subject to Federal income tax.

Contributions made to you are deductible by individual donors in arriving at their taxable net income in the manner and to the extent provided by section 23(e) of the Internal Revenue Code, as amended, and corresponding provisions of prior revenue acts, and by corporate donors in the manner and to the extent provided by section 23(q) of the Internal Revenue Code, as amended.

Requests, 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 612(d) and 661(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)(a) and 1004(b)(1) 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.

By direction of the Commissioner.

Very truly yours,

(Signed) E. I. McLarney

Deputy Commissioner

BLSmith/jls 3/23/48