

Department of the Treasury

District Director

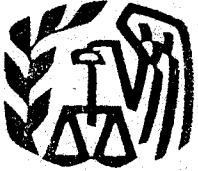
Internal Revenue Service

Date:

JAN 23 1973

In reply refer to:

Au:FA1:1150:RW



Virginia Commonwealth University
Medical College of Virginia
Health Sciences Center
Richmond, Virginia 23219

Gentlemen:

This is in reference to your letter of November 28, 1972, requesting a ruling letter be issued giving your organization exemption from Federal income tax pursuant to the merger of the Medical College of Virginia and Richmond Professional Institute.

In a letter dated August 8, 1952, the Medical College of Virginia was advised that evidence indicated that the organization was an instrumentality of the government of the State of Virginia and therefore not subject to Federal income tax and not required to file income tax returns.

In a letter dated July 10, 1951, the Richmond Professional Institute was advised that in as much as it was a division of the College of William and Mary, an agency of the Commonwealth of Virginia, it was not subject to Federal income tax and not required to file income tax returns.

Inasmuch as the Medical College of Virginia and the Richmond Professional Institute are now merging into the Virginia Commonwealth University, it is held that the Virginia Commonwealth University is an instrumentality of the government of the State of Virginia and therefore not subject to Federal income tax and not required to file income tax returns.

Contributions made to you are deductible by the donors in computing their taxable net income in the manner and to the extent provided in section 170 of the Internal Revenue Code of 1954.

Bequests, legacies, devises or transfers to or for your use are deductible in computing the value of the taxable estate of a decedent for Federal estate tax purposes and in the manner and to the extent provided by sections 2055 and 2106 of the 1954 Code. Gifts of property to or for your use are deductible in computing taxable gifts for Federal gift tax purposes in the manner and to the extent provided by section 2522 of the 1954 Code.

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Virginia Commonwealth University

Since we have concluded that you are an instrumentality of the government of the State of Virginia, services performed in your employ are excepted under the Federal Insurance Contribution Act and the Federal Unemployment Tax Act.

Coverage of your employees under the old-age survivors and disability insurance system may be effected only by recourse to the agreement entered into between the State of Virginia and the Department of Health, Education, and Welfare pursuant to section 218 of the Social Security Act, as amended.

Sincerely yours,

William D. Waters

William D. Waters
District Director