

## Office of General Counsel

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March 27, 2013

To whom it may concern:

Re:

Requests for Evidence of Tax Exempt Status of the University of Wisconsin System (State ID: #40706;

Federal ID: #39-6006492 and #39-1805963)

This letter is intended for use in grant applications or as a response to specific requests from potential donors, estates, trusts and businesses inquiring about the tax-exempt status of the University of Wisconsin System.

All University of Wisconsin institutions are non-profit, tax-exempt units of the Board of Regents of the University of Wisconsin System, a body corporate and an agency of the State of Wisconsin established under Chapter 36, Wisconsin Statutes, which has the Wisconsin State Treasurer as its treasurer.

As a state agency, the Board of Regents has tax-exempt status under Section 115, Internal Revenue Code, and as a corporation could also qualify for tax exempt status under Section 501(c)(3), Internal Revenue Code, by virtue of the following factors:

- 1. It is organized and operated exclusively for educational, research and public service purposes under Wisconsin statues;
- 2. As an agency of the State of Wisconsin no income can inure in whole or in part, to the benefit of private individuals; and
- 3. Wisconsin Statutes require that it must not by any substantial part of its activities attempt to influence legislation by propaganda or otherwise.

All bequests, devices, income, donations, contributions and gifts to the Board of Regents of the University of Wisconsin System or any of its institutions or operations are exempt income or charitable deductions under Section 170(c)(1), Internal Revenue Code.

Sincerely,

Tomas L. Stafford General Counsel