

CONSEJO DE EDUCACION SUPERIOR

Apartado 23305, Estación Postal U.P.R. Río Piedras, Puerto Rico 00931
Tel. (809) 758-3350



CERTIFICATION

I, Ismael Ramírez-Soto, Executive Director to the Council on Higher Education, DO HEREBY CERTIFY THAT:-----

Pursuant to Ac. No. 1 of January 10, 1966, Article 13, Section (f), the University of Puerto Rico is exempted from the payment of any taxes, imposts, duties, or fees of any kind whatsoever on all the properties of whatever nature acquired by the University, or on its operations, transactions or activities, or on the income derived from the same. Furthermore, all bonds, notes, mortgage obligations and other obligations of the University of Puerto Rico shall be exempt from payments of any income tax, and all debts or obligations of the University are of the exclusive responsibility of the University of Puerto Rico.

In San Juan, Puerto Rico, this thirteenth day of February, nineteen ninety two.

Ismael Ramírez Soto
Director Ejecutivo

gjn

January 4, 1955

T.R:PEO:S
CSG

University of Puerto Rico

Rfo Piedras, Puerto Rico

Gentlemen:

It is our opinion, based upon the evidence presented, that you are exempt from Federal income tax as an organization described in section 501(c)(3) of the Internal Revenue Code of 1954, as it is shown that you are organized and operated exclusively for educational purposes.

Accordingly, you are not 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 District Director of Internal Revenue, Lower Manhattan, Customhouse Building, Bowling Green, New York 4, New York, in order that their effect upon your exempt status may be determined.

Contributions made to you are deductible by the donors in computing their taxable income in the manner and to the extent provided by section 170 of the 1954 Code (and, where applicable, by sections 23(e) (2) and (q) (2) of the 1939 Code).

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 in the manner and to the extent provided by sections 2055 and 2106 of the 1954 Code (and, where applicable, by sections 812(d) and 861(c)(3) of the 1939 Code). Gifts of property to you 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 (and, where applicable, by sections 1004(c)(2)(E) and 1004 (b) (2) and (3) of the 1939 Code).

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It will not be necessary for you to file the annual return of Information, Form 990A, generally required of organizations exempt under section 501 (c) (3) of the Code 1954, as you come within the specific exceptions contained in section 6033 (a) of the Code.

Your attention is called to the provisions of section 501(c)(3) of the Internal Revenue Code of 1954 under which your exemption will be revoked if any substantial part of your activities consists of carrying on propaganda, or otherwise attempting, to influence legislation, or if you participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of any candidate for public office.

If you are a wholly-owned instrumentality of the State, services performed for your organization are except from "employment" under section 3121 (b)(7) of the 1954 Code, as amended. In view of the Congressional purpose behind section 218 of the Social Security Act, as amended, of allowing State governments discretion in determining which State employees should be covered under the Old-Age and Survivors Insurance System, the waiver provisions of section 3121(k) of the 1954 Code are inapplicable. Such coverage as may be affected will require recourse to section 218 of the Social Security Act, which is administered by the Department of Health, Education and Welfare. If you are in doubt as to your status as a wholly-owned instrumentality, the matter should be taken up with the District Director of Internal Revenue for your district.

The District Director of Internal Revenue, Lower Manhattan, New York, is being advised of this section.

Very truly yours,

(Signed) P. Henry Needham

Chief, Pensions and
Exempt Organizations Branch

cc: Cumulative List
cc: District Director, Lower Manhattan (2)

CSGaskill/asg
12-22-54