



GERALD E. HUNTER

VICE CHANCELLOR FOR FINANCE & ADMINISTRATION

MEMORANDUM

TO: Whom It May Concern,

FROM: Gerald E. Hunter *geh*
Vice Chancellor for Finance and Administration

RE: TAX EXEMPT STATUS: Winston-Salem State University

DATE: April 8, 2009

Winston-Salem State University is an agency of higher education of the State of North Carolina which is governed by the University of North Carolina Board of Governors.

As an instrumentality of a governmental unit, the universities are not subject to Federal Income Tax under the provisions of Section 115(1) of the 1954 Internal Revenue Code, which states in part:

“Gross income does not include income derived from the exercise of any essential governmental function and accruing to a State or any political subdivision thereof...”

Therefore, contributions made to Winston-Salem State University are deductible under Section 170(c)(1) of the Internal Revenue Code.

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