



# TREASURY DEPARTMENT

WASHINGTON

OFFICE OF  
COMMISSIONER OF INTERNAL REVENUE

ADDRESS REPLY TO  
COMMISSIONER OF INTERNAL REVENUE  
AND REFER TO

TF:E:RR  
JPB

May 3, 1933.

The Chi Phi Educational Trust Fund,  
c/o Daniel D. Craft, Trustee,  
40 North Dearborn Street,  
Chicago, Illinois.

Sirs:

By letter of December 21, 1932, the collector at Chicago, Illinois, transmitted evidence in support of your claim to exemption under the Federal income tax law. By letter of April 12, 1933, you transmitted additional evidence.

It is shown by the evidence that you are formed and operated for acquiring a fund to be used for the following purposes:

"(a) To assist and supplement the work of universities, colleges and schools in the promotion of scholarship and development of the character and morality of students;

"(b) To provide improved educational facilities for students;

"(c) To make donations and/or loan money to universities, colleges and schools;

"(d) To assist needy and deserving students to complete their education;

"(e) To aid aged or disabled former students who are in need and are worthy of assistance;

"(f) To expend money for any other educational and/or charitable purpose not inconsistent with any of the foregoing specific purposes."

It is also shown that your income is derived from donations and investments and is being used to accumulate a fund the earnings of which will go to carry out your purposes; and that no part of your income will inure to the benefit of any private shareholder or individual.

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The Chi Phi Educational Trust Fund.

In view of the foregoing it is held that your purposes and activities are such as to bring you within the exemption provided in section 103(6) of the Revenue Act of 1932 and the corresponding provisions of prior acts.

In accordance with this ruling based on the evidence submitted you will not be required to file returns for 1932 and prior years, and future returns will not be required so long as there is no change in your organization, your purposes and method of doing business.

Any changes in your form of organization or method of operation must be immediately reported by you to the collector of internal revenue of the district in which you are located in order that the effect of such changes on your present exempt status may be determined.

The exemption granted in this letter does not apply to taxes levied under other titles or provisions of the respective revenue acts except in so far as the exemption is granted expressly under those provisions to corporations enumerated in section 103 of the revenue act of 1932 and the corresponding provisions of prior acts.

Since you are exempt under section 103(6) of the Revenue Act of 1932 and the corresponding provisions of prior acts it follows that contributions made to you are deductible in the individual returns of the donors in the manner and to the extent provided in section 23(n) of the Revenue Act of 1932 and the corresponding provisions of prior acts.

A copy of this letter is being sent to the collector of internal revenue, Chicago, Illinois.

By direction of the Commissioner.

Respectfully,

  
Acting Deputy Commissioner.