



HEL-EO-59-8

U. S. TREASURY DEPARTMENT  
INTERNAL REVENUE SERVICE  
DISTRICT DIRECTOR  
HELENA, MONTANA

IN REPLY REFER TO

July 15, 1959

A:R:AE/hkh

Montana State College  
Bozeman  
Montana

Gentlemen:

Reference is made to your application for exemption under Section 501(c)(3) of the Internal Revenue Code and evidence submitted in connection therewith for use in determining your status for Federal tax purposes.

It is the opinion of this office, based upon the evidence presented, that you are exempt from Federal income tax under the provisions of 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, and therefore, you are 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 by 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 net estate of a decedent for estate tax purposes in the manner and to the extent provided by Sections 2055(a) and 2106(a)(2) of the Code. Gifts of property to you are deductible in computing net gifts for gift tax purposes in the manner and to the extent provided in Section 2522(a)(2) and 2522(b)(2) and (3) of the Code.

Section 501(c)(3) is a subdivision of Section 501(a) of the Internal Revenue Code of 1954, and accordingly, institutions exempt under this subdivision are entitled to any benefit that may be available under the provisions of Section 403 of the 1954 Code.

Very truly yours,

Keith H. Stokes, Acting Chief  
Audit Division

