May 12, 2015

TO WHOM IT MAY CONCERN:

This is to certify that, to the best of my knowledge, the determinations made by the Internal Revenue Service in its letter dated October 4, 1961 and April 9, 1976 concerning the status of the Regents of the University of Michigan with respect to Section 501(c)(3) and Section 509(a)(1) of the Internal Revenue Code have not been modified or rescinded.

Sincerely,

Timothy G. Lynch
Internal Revenue Service

Department of the Treasury

Washington, DC 20224

The Regents of the University of Michigan
4020 Administration Building
Ann Arbor, Michigan 48104

Person to Contact: J. Fillmore
Phone Number: 202-934-4757
Telephone Number:

Refer Reply to: E:EO:T:R:1:3-JL

Date: APR 9 1976

Gentlemen:

This is in reply to your letter of January 21, 1976, requesting a ruling with respect to your private foundation status.

Our records indicate that you have filed the notice described in section 508(b) of the Internal Revenue Code. Based on the information you submitted, we have classified you as an organization that is not a private foundation as defined in section 509(a)(1) of the Code.

Your classification is based on the assumption that your operations will be as stated in your notification. Any changes in your purposes, character or method of operation must be reported to your District Director, Detroit, Michigan, so that he may consider the effect on your status.

Sincerely yours,

Jeanne S. Gessay
Chief, Rulings Section 1
Exempt Organizations
Technical Branch
The Regents of the University of Michigan
500 South State Street
Ann Arbor, Michigan

Gentlemen:

Consideration has been given to your application for exemption from Federal income tax under section 501(c)(3) of the Internal Revenue Code of 1954.

Our records show that you were held to be exempt under section 101(6) of the Revenue Act of 1938 and the corresponding provisions of prior revenue acts, by a ruling dated December 1, 1939. A ruling of August 12, 1943, modified the ruling of December 1, 1939, and held you to be exempt from Federal income tax as a wholly-owned instrumentality of the State of Michigan.

You indicate that the reason you are applying for exemption under section 501(c)(3) of the Code is that your employees desire to avail themselves of the tax treatment provided under section 403(b) of the Code.

You were constituted a body corporate by specific provision of Article II, Section 4, of the Constitution of the State of Michigan of 1908, to operate the University of Michigan. Your authority is derived from that portion of Section 5 of the said Article II which states that the Board of Regents shall have the general supervision of the university and the direction and control of all expenditures from the university funds.

After careful consideration of all the evidence presented, including the provisions of the law under which you operate, it is concluded that you are an instrumentality of the State of Michigan, and that you are also exempt under section 501(c)(3) of the Code. Since you are exempt under section 501(c)(3), section 403(b) of the Code is applicable to annuity contracts purchased by you for your employees, provided the contracts meet the conditions of the latter section. This ruling modifies our ruling of August 12, 1943.
The Regents of the University of Michigan

Contributions made to you are deductible by donors as provided in section 170 of the Code. Bequests, legacies, devises, transfers or gifts to or for your use are deductible for Federal estate and gift tax purposes under the provisions of sections 2055, 2106 and 2522 of the Code.

Your District Director is being advised of this action.

Very truly yours,

[Signature]
Director, Tax Rulings Division
Form 4553
(June 1970)
Department of the Treasury
Internal Revenue Service

Notification Concerning Foundation Status

Name of organization
The Regents of The University of Michigan

Employer identification number
386-006-306N

Address
503 Thompson Street
Ann Arbor, Michigan 48104

City or town, state and zip code

Please place an "X" in the one numbered block that applies to your organization, provide any additional information called for, and return the form promptly to the Internal Revenue Service Center, 11601 Roosevelt Boulevard, Philadelphia, Pennsylvania 19155. Do not check a block until you have read the instructions and Code definitions applicable to the block. Section references are to the Internal Revenue Code of 1954.

1 □ We are a private foundation within the meaning of section 509(a). (If you are a private foundation, are you claiming status as an operating foundation within the meaning of section 4942(f)(3)?... □ Yes □ No □ If "Yes," attach a statement setting forth all the facts upon which you base your answer including an identification of the clause of section 4942(f)(3)(A) that is applicable.

We are not a private foundation because we are:

3 □ A school. Section 170(b)(1)(A)(ii).
5 □ A medical research organization operated in conjunction with a hospital. Section 170(b)(1)(A)(iv).
6 □ A governmental unit. Section 170(b)(1)(A)(v).
7 □ An organization operated for the benefit of a college or university owned or operated by a governmental unit. Section 170(b)(1)(A)(vi).

[Complete the Financial Schedule on page 2.]

8 □ An organization that normally receives no more than 50 percent of its support from gross investment income and more than 50 percent of its support from contributions, membership fees, and receipts from activities related to its exempt function. Section 509(c)(2).

[Complete the Financial Schedule on page 2.]

9 □ An organization operated solely for the benefit of one or more organizations described in section 170(b)(1)(A) through (j) (or for the benefit of one or more organizations described in section 170(b)(1)(A) through (j) (or (k) and described in 9 above), but not controlled by persons other than foundation managers. Section 509(c)(3).

[Attach a statement identifying and describing the organization(s) for whose benefit you are operated and the relationship between you and the organization(s).]

10 □ An organization organized and operated to test for public safety. Section 509(a)(4).

[Complete the Financial Schedule on page 2.]

11 □ We are not sure of our classification. (Attach a copy of your most recently filed information return, Form 990-A, if you filed one, and a statement describing your case and explaining why you are not sure of your classification. If you think you may be described in 7, 8, or 9, complete the Financial Schedule on page 2.)

I declare that I have examined the information entered on this form, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct and complete. (Must be signed by a principal officer, manager, or authorized trustee of organization.)

W. K. Pierson
(Vice President and Chief Financial Officer)

August 17, 1970
(Date)
## Financial Schedule

<table>
<thead>
<tr>
<th>Calendar year (or fiscal year ending in)</th>
<th>1974</th>
<th>1975</th>
<th>1976</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>13 Gifts, grants, and contributions received</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14 Membership fees received</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15 Gross receipts from admissions, sales of merchandise, performance of services, or furnishing of facilities in any activity which is not an unrelated business within the meaning of section 512</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16 Gross income from interest, dividends, rents, and royalties</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17 Net income from unrelated business activities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18 Tax revenues levied for your benefit and either paid to you or expended on your behalf</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19 The value of services or facilities furnished by a Governmental unit to you without charge (do not include the value of services or facilities customarily furnished to the public without charge)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20 Other income (do not include gain (or loss) from sale of capital assets)—attach schedule</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21 Total of lines 13 through 20</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22 Line 21 less line 15</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Instructions for Financial Schedule

If you checked block 7 or 8 on page 1, attach a statement showing the name of and amount received from each person (other than a Governmental unit or a "publicly supported" organization) from whom you received, during the above 4-year period, contributions totaling more than 1 percent of line 22(c).

If you checked block 9 on page 1, attach a statement showing:

1. The name of, and amount received in each year from, each "disqualified person" (other than an organization described in section 170(b)(1)(A)(i) through (vi)) from whom you received amounts included on line 13, 14 or 15; and
2. With respect to the amounts shown for each year on line 15, the name of, and amount received in each year from, each bureau or agency of a Governmental unit or person (other than a "disqualified person") and each person described in section 170(b)(1)(A)(i) through (vi) from whom you received an amount in excess of the greater of $5,000 or 1 percent of the amount shown for the year on line 21.