

Letter of Determining 1.04



U. S. TREASURY DEPARTMENT
INTERNAL REVENUE SERVICE
WASHINGTON 25, D. C.

MAY 26 1964

IN REPLY REFER TO
T:R:EO:3-JFM

The Woman's Cancer Association of
the University of Miami, Inc.
700 West Flagler Street
Miami, Florida

PURPOSE	
Charitable	
ADDRESS INQUIRIES & FILE RETURNS WITH DISTRICT DIRECTOR OF INTERNAL REVENUE	
Jacksonville, Florida	
FORM 990-A REQUIRED	ACCOUNTING PERIOD ENDING
<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	March 31

Mesdames:

Based upon the evidence submitted, it is held that you are exempt from Federal income tax as an organization described in section 501(c)(3) of the Internal Revenue Code, as it is shown that you are organized and operated exclusively for the purpose shown above. Any questions concerning excise, employment or other Federal taxes should be submitted to your District Director.

You are not required to file Federal income tax returns so long as you retain an exempt status, unless you are subject to the tax on unrelated business income imposed by section 511 of the Code and are required to file Form 990-T for the purpose of reporting unrelated business taxable income. Any changes in your organization's character, purposes or method of operation should be reported immediately to your District Director for consideration of their effect upon your exempt status. You should also report any change in your name or address. Your liability for filing the annual information return, Form 990A, is set forth above. That return, if required, must be filed after the close of your annual accounting period indicated above.

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.

You are not liable for the taxes imposed under the Federal Insurance Contributions Act (social security taxes) unless you file a waiver of exemption certificate as provided in such act. You are not liable for the tax imposed under the Federal Unemployment Tax Act. Inquiries about the waiver of exemption certificate for social security taxes should be addressed to your District Director.

Your District Director is being advised of this action.

Our letter to you dated May 13, 1964, advising that you are not relieved of the requirements for filing Federal income tax returns, may be disregarded.

Per your request, the three letters submitted as additional information in your letter of April 21, 1964 are enclosed.

Very truly yours,

(Signed) R. J. Stakem

Acting Chief, Exempt Organizations Branch

Enclosures:
Three letters

Internal Revenue Service

Department of the Treasury

District
Director

Delaware-Maryland District 31 Hopkins Plaza, Baltimore, MD 21201

August 28, 1997

P.O. Box 13163
Baltimore, MD 21203

Employer Identification Number:

Woman's Cancer Association of the
University of Miami
1350 W Flagler Street
Miami, FL 33135-2320

59-0871128

Person to Contact:
EP/EO Tax Examiner

Telephone Number:
(410) 962-6058

Dear Sir/Madam:

This is in response to your inquiry, requesting a copy of the letter which granted tax exempt status to the above named organization.

Our records show that the organization was granted exemption from Federal Income Tax under section 501(c)(3) of the Internal Revenue Code effective May 1964.

We have also determined that the organization is not a private foundation because it is described in section 509(a)(2).

Donors may deduct contributions to you under section 170 of the Code.

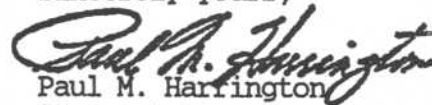
As of January 1, 1984, you are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$100 or more you pay to each of your employees during a calendar year. You are not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

You are required to file Form 990, Return of Organization Exempt from Income Tax, only if your gross receipts each year are normally more than \$25,000. However, if you receive a Form 990 package in the mail, please file the return even if you do not exceed the gross receipts test. If you are not required to file, simply attach the label provided, check the box in the heading to indicate that your annual gross receipts are normally \$25,000 or less, and sign the return.

A copy of our letter certifying the status of the organization is not available, however, this letter may be used to verify your tax-exempt status.

Because this letter could help resolve any questions about your exempt status, it should be kept in your permanent records.

Sincerely yours,


Paul M. Harrington
District Director

**The Woman's Cancer Association of the University of Miami
Endowment Policy** *PIW/11*

Background: In 1999 the WCA made the decision to create an endowment fund that would support in perpetuity cancer research at the University of Miami/Sylvester Comprehensive Cancer Center. The endowment is housed within the University of Miami pooled funds and is managed by the University of Miami investment committee. The WCA endowment was established in memory of Pearl M. and Edwin L. Powell and was created from gifts received from the distribution of their estate. Until her demise, Mrs. Powell was a member of the Bush Chapter of the WCA.

Procedure:

- Five percent of the interest earned is distributed to the Sylvester Comprehensive Cancer Center on an annual basis. The remaining interest earned is deposited back into the WCA endowment so that the principal continues to grow.
- Annually, at the beginning of May, the SCCC development office will send to the president of the WCA a memo indicating the interest distribution for the WCA endowment fund. The amount of interest distribution is provided by the UM treasurers office.
- The WCA's annual contribution to the Sylvester Comprehensive Cancer Center will be increased by the amount of interest earned from the endowment.
- The WCA has the right to allocate a percentage of the interest earned to its Silver Lady Tea Fund. The president of the WCA will convey in writing to the director of the Sylvester Comprehensive Cancer Center the amount to be donated to the Silver Lady Tea Fund. Rather than writing a check from the SCCC to the WCA, an amount equal to the amount of endowment interest to be designated for the Silver Lady Tea Fund will be retained by the WCA and not included in its annual allocation to the Cancer Center.
- The WCA can deposit additional contributions to the endowment fund throughout the year, or at the time of its annual gift to the Sylvester Comprehensive Cancer Center.
- The WCA treasurer will credit any legacy gifts received by a specific chapter to the chapter's annual contribution total.
- The WCA may elect to deposit any and all future legacy or estate gifts received into the WCA permanent endowment account.
- When a cure for cancer is discovered and there is no longer a need for cancer research the WCA has the right and authority to redirect the purpose of its endowment fund.