



UNIVERSITY OF KENTUCKY

Office of the Treasurer

301 Peterson Service Building
Lexington, KY 40506-0005

(859) 257-4758

Fax: (859) 257-4805

www.uky.edu

May 15, 2008

TO WHOM IT MAY CONCERN:

The University of Kentucky Research Foundation Inc., is a 501(c)(3) non-profit corporation and is also classified as a non private foundation pursuant to IRC Sec. 509(a)(3). The tax status was confirmed in a letter dated May 05, 2004 from the Internal Revenue Service.

Sincerely,

A handwritten signature in blue ink that reads "Ronda S. Beck". The signature is written in a cursive style with a large initial 'R' and 'B'.

Ronda S. Beck
Controller

Internal Revenue Service

Department of the Treasury

District
Director

P.O. Box 2508
Cincinnati, OH 45201

Date: November 17, 1992

Person to Contact:

Myrna Huber

Telephone Number:

513-684-3957

Refer Reply to:

EP/EO

Employer Identification Number:

61-6033693

University of Kentucky Research
Foundation
369 Peterson Service Bldg.
Lexington, KY 40506

Dear Sir or Madam:

This is in response to a request for a copy of your determination letter.

Our records indicate that by our letter issued in July, 1947, you were held to be exempt from Federal income tax under section 101(6) of the Internal Revenue Code of 1939 which corresponds with section 501(c)(3) of the Internal Revenue Code. This letter is still in effect.

Based on information subsequently submitted, we classified your organization as one that is not a private foundation within the meaning of section 509(a) of the Code because you are an organization described in section 509(a)(1) and 170(b)(1)(A)(vi).

The classification was based on the assumption that your operations would continue as stated in the application. If your sources of support, or your purposes, character, or method of operations have changed, please let us know so we can consider the effect of the change on your exempt status and foundation status.

As of January 1, 1984, you are liable for taxes under 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).

Organizations that are not private foundations are not subject to the excise taxes under Chapter 42 of the Code. However, you are not automatically exempt from other Federal excise taxes. If you have any questions about excise, employment, or other Federal taxes, please let us know.

Donors may deduct contributions to you as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to you or for your use are deductible for Federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

(2)

University Of Kentucky Research Foundation

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. If a return is required, it must be filed by the 15th day of the fifth month after the end of your annual accounting period. The law imposes a penalty of \$10 a day, up to a maximum of \$5,000, when a return is filed late, unless there is reasonable cause for the delay.

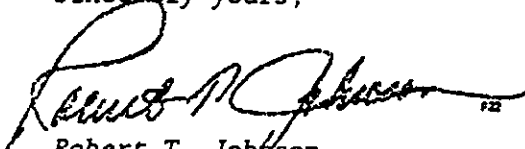
You are not required to file Federal income tax returns unless you are subject to the tax on unrelated business income under section 511 of the Code. If you are subject to this tax, you must file an income tax return on Form 990-T, Exempt Organization Business Income Tax Return. In this letter, we are not determining whether any of your present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

Because this letter could help resolve any questions about your exempt status and foundation status, you should keep it in your permanent records.

If you have any questions, you may contact us at the address or telephone number shown in the heading of this letter.

This is an affirmation letter.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Robert T. Johnson". The signature is fluid and cursive, with a small "12" written at the end of the line.

Robert T. Johnson
District Director